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ABSTRACT

This New York state plan provides a framework for promoting full opportunities for all individuals with disabilities in both the workplace and the community. It is a legal compact which describes the nature, scope, and conditions of the state's program and ensures that program administration will conform to federal legislation and regulations. The plan begins with an outline of the vocational rehabilitation process in New York and then presents priorities, current activities, and planned activities for fiscal years 1992-1994. Priorities include: improve access to services and programs of the State Education Department, ensure coordination of services, increase integrated employment options, foster independent living services, improve access to vocational rehabilitation services, and improve program and fiscal management. Activities conducted to coordinate educational and vocational services are then described. Appendices comprise approximately three-fourths of the planning document and include: (1) required state assurances; (2) a description of services and planned activities for vocational rehabilitation and supported employment (Attachments for Title I and Title VI of the Rehabilitation Act of 1973 as amended in 1986); (3) a list of district offices of the New York Office of Vocational and Educational Services for Individuals with Disabilities (VESID); and (4) a list of New York Independent Living Centers. (JDD)

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The New York State Plan for Vocational Rehabilitation and Supported Employment for Federal Fiscal Years 1992, 1993, and 1994

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The New York State Plan
for Vocational Rehabilitation
and Supported Employment
for Federal Fiscal Years
1992, 1993, and 1994

The University of the State of New York
The State Education Department
Office of Vocational and Educational
Services for Individuals with Disabilities

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I. INTRODUCTION

Purpose of the State Plan

The State Plan for Vocational Rehabilitation and Supported Employment for Federal Fiscal Years 1992 to 1994 provides the framework for the Office of Vocational and Educational Services for Individuals with Disabilities (VESID) to promote full opportunities for all individuals with disabilities in both the workplace and the community. It is a legal compact which describes the nature, scope, and conditions of the State's program and ensures that program administration will conform to the Rehabilitation Act and Federal regulations. The publication of this plan allows VESID to comply with the initiatives required by the Rehabilitation Act and its amendments and serves as a basis for continuing Federal funds.

In accordance with the Rehabilitation Act of 1973 (Public Law 93-112) as amended by the 1986 Amendments (Public Law 99-506), the State Plan for Vocational Rehabilitation and Supported Employment for Federal Fiscal Years 1992 to 1994 consists of:

- Required State assurances;
- Attachments for Title I and Title VI; and
- Goals and priorities for fiscal years 1992 to 1994 for vocational rehabilitation and supported employment.

The required State assurances provide a series of guarantees that New York State is delivering vocational rehabilitation services as mandated by Federal guidelines. These assurances are provided in Appendix A.

The attachments for Title I and Title VI provide the current status of how VESID is addressing critical areas of vocational rehabilitation and supported employment services (Appendix B).

The priorities for Federal Fiscal Years 1992, 1993, and 1994 for vocational rehabilitation and supported employment were developed as a result of extensive public comment during the period September 1989 through December 1990. Current activities undertaken by VESID to address these priorities are described under each priority section. In addition, these priorities provide the focus for activities planned and the methods to be used to evaluate the effectiveness of these activities.

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II. THE VOCATIONAL REHABILITATION PROCESS IN NEW YORK STATE

VESID, which is an office of the New York State Education Department, is the designated New York State vocational rehabilitation agency for persons with disabilities, other than those who are legally blind. Services for individuals who are legally blind are provided by the Commission for the Blind and Visually Handicapped (CBVH). VESID services assist people with disabilities in preparing for, finding, and adjusting to employment. The responsibilities of the office include the development and coordination of appropriate services to support people with disabilities in leading self-sufficient, self-directed lives to the maximum extent possible.

Mission Statement

Consistent with its responsibilities, VESID has adopted the following mission statement:

- To provide educational, vocational, and counseling services to people whose disabilities impose barriers to employment;
- To increase the access of all people with disabilities, regardless of age, minority status or disability, to the full range of services that are offered within the SED and other agencies which provide services to individuals with disabilities; and
- To coordinate lifelong educational services to persons with disabilities.

VESID works with people with disabilities to assist their entry into the job market by providing an array of services to meet their unique needs. Throughout the vocational rehabilitation process, persons in need of services work with professional vocational rehabilitation counselors to choose, develop, and complete their plans for employment. Services may include medical and vocational evaluation, educational and vocational counseling and services, job training and placement, job follow-up, and other services to support the individuals' vocational rehabilitation objectives.

VESID's mission includes responsibility for the overall coordination of educational, vocational, and rehabilitation services to all persons with disabilities, regardless of gender, race, age, creed, color, national origin, or disability. The overall coordination of such services is being achieved through interagency and intra-agency coordination activities.

The focus of interagency activities is to ensure that services provided by the State Education Department (SED) for persons with disabilities of any age are coordinated with services provided by other New York State agencies. This coordination will ensure that services are nonduplicative, comprehensive, and designed to meet the needs of persons with disabilities in such a manner as to maximize the effect of each agency's efforts.

The focus of intra-agency activities within the SED is to ensure access for persons with disabilities to the wide range of lifelong educational services that are available through the SED to all residents of New York State. As one of the major offices of the SED, VESID is closely linked with other educational programs that can benefit individuals with disabilities. Coordination among these educational programs, such as elementary and secondary school programs, colleges, universities, and adult and continuing education programs, will improve the employability of individuals with disabilities and encourage their full and independent participation in society.

In addition to providing vocational rehabilitation services, VESID also administers State funding to 35 Independent Living Centers across New York State. Independent living centers are private community-based, consumer-managed, nonresidential advocacy organizations that assist individuals with disabilities in living more independently in their communities.

VESID Philosophy of Service

All services provided through VESID's various programs are predicated on a basic, consumer-centered philosophy. This philosophy, which guides all activities of the office, includes the following components:

- VESID's services shall be provided with dignity and respect for consumers and their families; policies and procedures shall be clear, concise, readily available, and implemented consistently throughout the State.
- VESID's services leading to employment and employment itself shall be provided in the most integrated community-based setting that is appropriate to the individual's needs, abilities, and preferences, and shall emphasize timely and appropriate transition among educational and vocational settings.
- VESID shall encourage every consumer to be an active participant in establishing immediate and long-range educational and vocational goals and in choosing and pursuing strategies to achieve maximum career potential.

- The consumer and the family are primary sources of information about vocational aspirations, interests, abilities, and goals, as well as eligibility and need for services.
- VESID shall collect and require only that information directly relevant to eligibility and the educational/ vocational goals of the consumer.
- VESID shall avoid duplicative assessments, use existing evaluations, rely upon information provided by other agencies to the fullest extent possible, and facilitate interagency cooperation in planning and implementing services.

The Vocational Rehabilitation Process

The vocational rehabilitation process in New York State assists people with disabilities with their initial entry or re-entry into the job market by providing an array of services to meet their unique needs. Throughout the vocational rehabilitation process, persons in need of services work with professional vocational rehabilitation counselors to choose, develop, and complete their plans for employment. Services may include a health and disability assessment, vocational evaluation, educational and vocational counseling, job training and placement, job follow-up and other services to support the individual's vocational rehabilitation objectives. VESID provides its services through 15 district offices and 10 satellite Offices. A list of these offices is included in Appendix C.

VESID provides services so that individuals with disabilities will be matched with jobs that meet their individual capabilities and needs. The individual and family are a primary source of information. Every individual who applies for or receives services is encouraged to be an active participant throughout the vocational rehabilitation process. To this end, the vocational rehabilitation counselor, working closely with the individual, is the key provider of services in the rehabilitation process. VESID counselors work closely with applicants for services to review their interests and goals, medical documentation, functional and vocational assessment results. In addition, counselors apply their expertise and training to the individual situation when determining eligibility. This is in keeping with the individual nature of the vocational rehabilitation process. Consistency is ensured through case reviews, supervision, and training on decision making. More than 350 professional rehabilitation counselors are employed by VESID throughout the State to work with persons with disabilities.

The main role of the VESID counselor is to help individuals whose disabilities create a barrier choose employment goals and plan for services so they can reach these goals. Counselors provide direct services such as counseling, guidance, and placement. They also purchase assessments, training, and other services from private proprietary and not-for-profit agencies. Specialized Rehabilitation Counselors for the Deaf are assigned to each district office. Counselors receive in-service training to maintain their counseling skills and gain new skills and service techniques.

As defined by Federal legislation, individuals who have disabilities must meet certain eligibility criteria to qualify for vocational rehabilitation services. First, the individual must have a physical or mental condition which results in a substantial barrier to employment. Second, the person must reasonably be expected to benefit in terms of employability. The existence of a disability alone is not sufficient to receive vocational rehabilitation services; the disability must seriously impede the individual's ability to work. The person must also have the potential and desire to work.

Eligibility criteria are applied to each individual. This means that, because each situation is different, the same disability which prevents one individual from working may not substantially pose an obstacle to another individual's ability to obtain or maintain a job.

Referral

Any individual with a disability can apply to VESID for services. The individual can come to VESID on his or her own, or can be referred to VESID by another source. Major referral sources include, but are not limited to, parents, doctors, advocates, schools, community mental health facilities, rehabilitation facilities, the New York State Employment Service, hospitals, and social services agencies. The referral is completed when all necessary information, including the person's name, address, referral disability, date of birth, and gender, has been collected.

Intake

Intake is the process through which VESID staff learn about the applicant's needs and the applicant learns about the services available from VESID. When a referral is made to VESID, an intake interviewer, counselor assistant, or rehabilitation counselor interviews the individual with a disability at a convenient time and place. During the intake process, VESID staff provide information about services and obtain information about the applicant's career goals, disability, needs, expectations, and abilities in order to determine eligibility for VESID services. The applicant and the family are a primary source of information about vocational aspirations, interests, abilities, and the need for services. Information available through the referral source and other agencies is also obtained. All information concerning persons applying for or receiving vocational rehabilitation services is kept confidential and may be released only with the consent of the individual.

Assessment

To determine whether an individual is eligible for vocational rehabilitation services, the existence of a disability must be established. All applicants complete a Confidential Health Assessment which provides information on the current health status of the individual, including an indication of how the disability affects the applicant's employability. VESID is also working with other State agencies and schools to obtain existing assessments, including medical and psychological evaluations, whenever such documentation of a disability is already available. The goal of these efforts is to eliminate the unnecessary duplication of testing of persons who apply for VESID's services. VESID staff will collect only the information necessary to determine eligibility and to plan for services.

More specific vocationally oriented information is obtained through vocational evaluation, which can include standardized tests, work samples, interest inventories, real work tasks, situational assessments and a review of the person's work history to assess work abilities and skills. This comprehensive evaluation determines if vocational rehabilitation can benefit the individual in terms of employability. It may also establish the presence of a disability and/or obstacle to employment.

A vocational evaluation may be conducted at the VESID District Office or at a rehabilitation facility, school, BOCES, or work site. The costs of all necessary diagnostic and evaluation services are covered by VESID. Support services such as transportation to assessment and evaluation appointments are also provided by VESID. All information is strictly confidential; no information will be released to or obtained from other parties without the written permission of the individual with a disability.

Eligibility

Eligibility is the process by which a VESID counselor determines whether an individual has a physical or mental disability that is a substantial barrier to employment and whether there is a reasonable expectation that VESID services may assist the individual achieve employment. The eligibility for such services is based on Federal law and regulation.

In some instances, the applicant is assumed to be immediately eligible based on the professional judgment of the counselor, in spite of the fact that further information, such as an examination by a physician skilled in the diagnosis and treatment of a particular aspect of a disability, may be needed. If the individual can benefit from immediate initiation of services, services may be provided up to 90 calendar days under an interim determination of eligibility. In addition, if a person is eligible for services and employment in a particular state and is available for services and employment in New York State, he/she can apply for services, since eligibility is not based on length of residence in the State.

If an applicant's disability causes a substantial barrier to employment, but the counselor is unsure whether there is a reasonable expectation that VESID services will lead to employment, the counselor may certify the individual for an extended evaluation for up to 18 months in order to provide services to determine rehabilitation potential. This may be appropriate for an individual when the options for services are not readily apparent. A plan for extended evaluation is prepared with the applicant to identify the services to be provided and the anticipated duration.

In some situations, there is insufficient information available to determine eligibility, or there is a need to review the information or consult with other staff after the initial interview. The counselor, after consultation with the applicant, will decide whether further evaluations are needed to assist in determining eligibility (such as, but not limited to, medical or psychological evaluations) and arrange for the evaluations as quickly and simply as possible.

In all cases, as soon as eligibility is established, the counselor will inform the applicant about the decision and schedule a meeting to complete the development of the plan for services. If there is evidence that an applicant is not eligible for VESID services, or services are unable to be provided, this determination is discussed with the applicant and, as appropriate, the applicant's parents, guardian, legal representative, and referral source.

The individual will be informed in writing that he or she has been determined ineligible and will be given the reasons for this determination. The individual will also be informed about other appropriate services, such as those available through Independent Living Centers. If the individual disagrees with the determination, information will be provided at such time about the individual's right to appeal. An individual dissatisfied with any decision or action by VESID has the right to a timely review of the situation. A review must be requested in writing within 90 days of the action or decision with which the individual disagrees. VESID also notifies the individuals of assistance they can obtain with the review process that is available through the Client Assistance Program (CAP). Every individual has a right to an administrative review by the district office or he/she may go directly to a fair hearing with a fair hearing officer. If an administrative review decision does not satisfy the individual, a fair hearing may then be requested. The VESID Deputy Commissioner will appoint a fair hearing officer within 15 days after receiving an individual's written request for a fair hearing. An impartial hearing officer will be appointed. The hearing officer will select a convenient date, time, and site for the hearing. The hearing will be held within 45 days of receipt of the individual's request for a fair hearing. The hearing officer's decision is final and the individual will be notified in writing of the decision no later than 21 days after the transcript of the hearing is received.

A booklet entitled *Administrative Reviews and Fair Hearings* is distributed to all individuals who are dissatisfied with a decision or action by VESID. The booklet outlines in detail the course of action an individual should follow as well as their right to a timely review of a situation.

Individualized Written Rehabilitation Plan

The process of planning a vocational program is dynamic and developmental. It begins at the initial interview and continues as the counselor and individual meet to consider options and work to develop a mutually agreed upon rehabilitation plan to reach a chosen vocational goal. After eligibility has been determined, the individual with a disability and the rehabilitation counselor consider options, choose a vocational goal, and plan the methods and time frames for reaching that goal based on information collected during the assessment. The counselor and individual together develop the Individualized Written Rehabilitation Program (IWRP) that will continue and formalize the case planning process that began during the initial interview. Family members, advocates, staff from referring agencies, or other representatives should be included in all steps of the planning process with the individual's permission, as appropriate. An IWRP outlines:

- the basis for the eligibility determination;
- long-range rehabilitation goals;
- all intermediate objectives;
- specific vocational rehabilitation services to be provided;
- projected start dates of each service and anticipated duration;
- assessment of the expected need for postemployment services;

- views of the individual;
- responsibilities of the individual and the counselor to achieve the IWRP;
- an explanation of the extent to which the individual and/or family is expected to contribute to the cost of services;
- objective criteria and schedule for measuring achievement of rehabilitation goals and objectives;
- the rights and responsibilities of the individual and VESID, including information about individual input into the program, the appeal process, and the Client Assistance Program; and
- other services required to assist the individual to live independently and participate fully in the community.

The IWRP is reviewed by the counselor with the individual receiving services at least once a year and is updated as necessary. Plan development results in a formal commitment by the VESID counselor and applicant to IWRP responsibilities and chosen vocational goals.

Service Delivery

Based upon the IWRP, there are many services which may be provided to persons with disabilities through the vocational rehabilitation system. These include:

- career planning and vocational counseling;
- restoration services and/or adaptive equipment to remove or reduce limitations for employment;
- work adjustment training;
- personal adjustment training;
- job skills training through work-study programs, transitional employment with job coaching, "on-the-job" programs, trade and business schools, and colleges and universities;
- driver/homemaker evaluation and training;
- assistance with support services during evaluation and training including public transportation/special trans-

portation, some maintenance expenses, attendants, note takers and interpreters, and Readers' Aid for matriculated college students;

- supported employment;
- sheltered employment;
- books, tools, and equipment needed for training and/or employment;
- telecommunication aids, rehabilitation engineering;
- assistance with some costs of home/vehicle modifications required for employment, including the work site;
- job seeking skills training to learn how to fill out a job application or develop a resume, handle job interviews successfully, and develop other job-related skills;
- occupational licenses, tools, initial stock and supplies for small business;
- job placement and postemployment follow-up services;
- referral to independent living services for peer counseling, advice on other benefits for individuals with disabilities, housing assistance, training in independent living skills; and
- referral for assistance from other agencies such as the Social Security Administration, Department of Social Services, Office of Mental Health, and Veterans Administration.

While VESID counselors provide career planning and vocational counseling services, most other services are purchased from rehabilitation facilities and other service providers. Rehabilitation facilities, which provide the largest volume of purchased services to VESID consumers, are not-for-profit agencies that offer an array of services to persons with physical or mental disabilities, including diagnostic vocational evaluation, personal and work adjustment training, specialized vocational training, job coaching and placement, and sheltered employment. Most of these services are provided under a unified service contract between the facility and VESID.

Placement in Employment

Planning for a job begins as soon as a person becomes eligible for vocational rehabilitation and the IWRP is developed.

However, the intensive placement activity usually occurs near the end of the individual's training or service plan. Placement activities may include job development with employers, instruction in job-seeking skills, work site modifications for accessibility, supervisor training, follow-up contacts to ensure job suitability, and support such as interpreters or attendants during job interviews. VESID counselors try to match the job requirements with the job skills of potential workers. Placement is successful when both the employee and employer are satisfied, the worker displays good social and work skills, the occupation matches the individual's capacities and abilities, and the working conditions do not aggravate the worker's disability.

Individuals with disabilities are placed in a variety of work settings. The majority are placed into integrated professional, manufacturing, and service positions. Some individuals with disabilities start or continue their own business and are considered successful self-employed individuals. Other individuals who may not be ready for the competitive labor market are placed in long-term supported employment or sheltered employment in rehabilitation facilities. Rehabilitation as a homemaker is another goal that is appropriate for those individuals for whom employment may not be an option.

III. THE NEW YORK STATE PLAN FOR VOCATIONAL REHABILITATION AND SUPPORTED EMPLOYMENT FOR FEDERAL FISCAL YEARS 1992 to 1994

This section provides a detailed description of how New York State will meet its responsibilities for providing vocational rehabilitation for individuals with disabilities. It describes the process by which VESID has established New York State's priorities for the next three years, VESID's current activities related to these priorities, planned activities for 1992 to 1994 and how VESID's activities and initiatives will be evaluated during this three year period.

Establishment of VESID Priorities

VESID established six major priorities to provide a framework for which activities would be planned and implemented during Federal Fiscal Years 1992-1994. These priorities were established through the collection of information concerning the current needs of people with disabilities across the State. VESID collected this information by sponsoring a series of work group meetings held throughout 1990 with individuals with disabilities, families, individuals representing other State agencies, rehabilitation facilities and schools, professionals and interested parties, as well as VESID staff. As a result, these priorities are in large part the result of guidance and direction provided by both individuals with disabilities and providers in the rehabilitation and education communities. To achieve these priorities, VESID will work in close cooperation with the Federal Rehabilitation Services Administration. The six priorities established are listed, not in order of importance, below:

Priority 1: Improve access for individuals with disabilities to services and programs of the State Education Department provided to the public-at-large.

Priority 2: Ensure coordination of services for individuals with disabilities with other New York State Agencies.

Priority 3: Increase integrated employment options for individuals with disabilities.

Priority 4: Foster independent living services for individuals with disabilities in communities.

Priority 5: Improve access for individuals with disabilities to vocational rehabilitation services.

Priority 6: Improve program and fiscal management of the Office of Vocational and Educational Services for Individuals with Disabilities.

Following the development of these statewide priorities, each of VESID's 15 district offices convened meetings to identify regional needs related to these priorities. The regional meetings involved groups consisting of people currently or previously served by VESID, individuals representing not-for-profit service providers, and invited representatives from State and local government. Particular emphasis was placed on including representatives knowledgeable about underserved and minority populations in their communities. These individuals were asked to assist the district offices by providing ideas and suggestions that could be used to improve the delivery of vocational and educational services for that individual district office during the coming year. These planning sessions provided approximately 400 individuals in the community with an opportunity to participate in the development of local services plans. The plans within each district office will incorporate VESID priorities of increasing access to services and improving integrated employment options for individuals with disabilities.

VESID Priorities, Current Activities and Planned Activities for 1992 to 1994

The following individually cites each of the six priorities established, the activities and initiatives undertaken by VESID to address each priority, planned activities related to each priority and the methods to be used for evaluating the effectiveness of the activities planned.

PRIORITY 1: ***Improve access for individuals with disabilities to the services and programs of the State Education Department provided to the public-at-large***

Current Activities Related to This Priority

The Intra-Agency Council: The State Education Department has a commitment to ensuring that all citizens, regardless of gender, race, age, creed, color, national origin, or disability, have access to the full array of services and programs offered by the Department. The Department has already allocated significant resources to services designed specifically for individuals with disabilities. However, there is a concern that individuals with disabilities experience difficulty in physically and programmatically accessing those services provided by the Department to the public-at-large. In response to this concern, the Department established the Intra-Agency Council in September 1989.

The Intra-Agency Council consists of representatives of the following offices: Commissioner of Education, Cultural Education, Elementary and Secondary Education, Vocational and Educational Services for Individuals with Disabilities, School Improvement and Support, Higher and Continuing Education, Regents College and the Professions. VESID's Deputy Commissioner is the Council's chairperson.

The mission of the Intra-Agency Council is to coordinate, support and ensure that all services and activities of the State Education Department are and will continue to be physically and programmatically accessible to individuals with disabilities. To achieve this mission, the following goals have been identified:

- Increase the level of awareness of Department staff on issues and needs of individuals with disabilities, as those issues and needs relate to the staff's Departmental activities and programs.
- Facilitate the coordination and implementation of activities to improve access and service delivery to individuals with disabilities.

During the past year, the Council has focused on the development of a Departmentwide coordinated plan for providing services to individuals with disabilities to ensure that there are no gaps in services offered by the Department and that equal access to services is provided for such individuals. This accessibility applies to internal Department programs and services as well as those programs and services in the field over which the Department has authority or exerts influence. *Plan for Ensuring Access for Individuals with Disabilities to All New York State Education Department Programs and Services* was submitted by the Intra-Agency Council to SED's Commissioner for his approval in March.

The Council also recognized the need for systemwide strategic planning and goal setting to guide the Department in addressing the needs of individuals with disabilities. Although several offices within the Department are responsible for developing plans and activities for such individuals, there needs to be an effective system within the Department for intra-agency communication and the coordination of such activities. VESID has responsibility for coordinating these activities within the Department. The following sections describe the various linkages that have been developed within the Department for services and programs to individuals with disabilities of any age.

Linking Services for Students with Disabilities: In addition to the Intra-Agency Council, the SED adopted a set of policies and activities to ensure that appropriate linkages exist between the secondary education and adult service systems within the Department. A critical transition occurs when students with disabilities are preparing to leave school and enter employment and/or higher education programs, adult education programs, adult services, or rehabilitation services. Individuals with disabilities lose access to the support systems of their local school districts and Committees on Special Education when they leave secondary school programs. This loss of the secondary school support system occurs at a time when the individual with a disability must cope with new requirements and procedures and a new organizational structure in accessing adult services and programs.

VESID conducted meetings across the State to gain input on policies concerning linking services for individuals with disabilities. Comments were received from over 6,000 individuals that highlighted issues to be included in the State Education Department's policies. A final proposal was developed that highlighted the need for new or revised regulations, policies, and guidelines to carry out linkages, or activities necessary to successfully initiate linkages. This proposal resulted in the adoption of ten comprehensive policies for linking services for individuals with disabilities as they transition from school programs into adult services, approved by the Board of Regents in June 1990.

VESID has undertaken a number of initiatives related to this policy initiative on linking services for students with disabilities as they transition from school-age programs to adult education programs, postsecondary programs, vocational rehabilitation and/or employment. The following summarizes several of these activities:

University Leadership Institutes: University Leadership Institutes are being conducted cooperatively with the Office for Special Education Services (OSES), the Office of Higher and Continuing Education (OHCE) and VESID. The purpose of these institutes is to bring faculty from college and university programs for special educators and vocational rehabilitation counselors together to discuss issues pertaining to the delivery of education and rehabilitation services for individuals with disabilities. Educators from across the State attend and provide information and feedback to one another on ways to enhance and improve education and service delivery programs.

New York City Schools: VESID is working with the New York City School District and the Office for Special Education Services to improve the linkage of services among these programs and agencies. A Vocational Focus Group has been established to ensure the implementation of transitional activities in New York City. This focus group consists of members of the Board of Regents, Executive Director of Special Education in New York City, New York City Superintendent of High Schools, New York City Superintendent of Citywide Schools, Assistant Commissioner of VESID, Director of Program Development of OSES, and Executive Director of New York Working.

Adult Education: The majority of adult education programs in New York State are provided through Adult Centers for Comprehensive Education and Support Services (ACCESS Centers), and Counseling, Assessment and Support Services for Education and Training (CASSET Sites). These ACCESS/CASSET Centers operate in school districts, Boards of Cooperative Educational Services (BOCES) and community colleges in all areas of the State. These Centers provide a wide range of education and training programs together with counseling, assessment, placement and support services at one central location to meet the education, training, retraining and employment needs of a wide range of adults and their families. During the past year, VESID and the Office of Continuing Education, which administers the ACCESS/CASSET Centers, have been working cooperatively to eliminate physical and programmatic barriers which prevent many individuals with disabilities from obtaining educational and placement services offered by these centers.

Supported Employment for School-Age Youth: VESID and the Office for Special Education Services (OSES) are reviewing supported employment services for students with disabilities throughout the State. The goal of this review is to identify how to expand and improve supported employment for students with disabilities in high school programs.

Activities Planned for 1992 to 1994

Improved access for individuals with disabilities to services and programs of the State Education Department will continue to be a major priority of VESID over the next three years. In the process of carrying out its priorities, VESID will accomplish the following:

- **Lifelong Learning:** VESID, in cooperation with the Office of Cultural Education and the Office of Higher and Continuing Education, will increase access to lifelong learning for individuals with disabilities by ensuring access to cultural institutions, libraries, museums, and adult literacy programs.
- **Physical and Programmatic Access:** VESID, in cooperation with the Office of Higher and Continuing Education, will increase physical and programmatic access for individuals with disabilities to all adult and continuing education programs and to two-year and four-year degree granting institutions.
- **Linking Services:** VESID, in cooperation with the Office of Higher and Continuing Education, will work to systemically link services for students with disabilities to vocational rehabilitation services, as well as to postsecondary programs, adult and continuing education, adult services, and higher education.

Evaluation: An annual evaluation will be undertaken to determine the effectiveness of VESID's efforts to increase accessibility for individuals with disabilities to all services and programs of the State Education Department provided to the public-at-large. The annual evaluation of the *Plan for Ensuring Access for Individuals With Disabilities to All New York State Education Department Programs and Services* by the Intra-Agency Council will review the Department's progress towards the goal of full accessibility for individuals with disabilities to all Department programs and services.

To assist Department offices in planning and developing programs and services, and to allocate resources to better serve individuals with disabilities, VESID will work with other major offices within the State Education Department to develop a comprehensive Department database which will include specific information on individuals with disabilities. This information will have the capability of being disaggregated for the purposes of tracking and cross-referencing data on individuals with disabilities.

The Board of Regents and the Department, as part of their major policy initiative, will annually evaluate the effectiveness of the statewide policies on linking services for students with disabilities as they transition from school-age programs to adult education programs, postsecondary programs, vocational rehabilitation and/or employment.

PRIORITY 2: ***Ensure coordination of services for individuals with disabilities with other New York State Agencies***

Current Activities Related to This Priority

The State Interagency Council for Vocational Rehabilitation was established through a Memorandum of Agreement between the Governor of New York State and the Chancellor of the Board of Regents to ensure that the State's vocational rehabilitation and related services are provided in a coordinated and nonduplicative manner. The Council consists of representatives of the Office of Advocate for the Disabled, Office of Mental Health, Office of Mental Retardation and Developmental Disabilities, Department of Labor, Division of Veterans' Affairs, Commission for the Blind and Visually Handicapped within the Department of Social Services, Commission on Quality of Care for the Mentally Disabled and the Education Department's Office of Vocational and Educational Services for Individuals with Disabilities. In addition to those member agencies, ad hoc participation in the Council is provided by the Division of Alcoholism and Alcohol Abuse and the Division of Substance Abuse Services. The agreement established that the Deputy Secretary to the Governor for Human Services and the Executive Deputy Commissioner of the Education Department would serve as cochairs of the Council.

The State Interagency Council serves as a State forum and focal point for discussion of appropriate systematic change concerning the manner in which vocational rehabilitation and related services are provided in New York. The efforts of the Council will result in more consistent eligibility criteria (including nonduplicative assessment procedures and documentation), increased reciprocal eligibility determinations, greater access to a wider range of services across systems, and well-defined roles and responsibilities in the development and administration of additional options for employment and vocational training.

VESID has played a primary role in the many activities initiated through the State Interagency Council. On October 12, 1990, the State Interagency Council approved a series of far-reaching recommendations that are directed at improving access to vocational rehabilitation and related services for individuals with disabilities in New York State. The Council recommendations are aimed at streamlining agency eligibility and intake procedures to allow individuals to enter the system faster. These include the

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use of an interagency referral form, the development of functional criteria to facilitate appropriate referrals, expanded use of interim eligibility by VESID, updating and refining State agency manuals and practices, and reciprocal acceptance of disability determination, whenever possible. The Council deliberations on supported and sheltered employment focused on three major areas: establishment of basic principles and operating guidelines; funding of supported employment services; and staffing of supported employment services.

The Council also agreed that State agencies will coordinate cross-systems training efforts. Individuals with disabilities will be involved in the training and curriculum development. The target audience will consist of staff from State agencies as well as providers and the general public. This training will focus on accomplishing the following three goals:

- Conduct statewide training to enhance the awareness of services provided by each State agency.
- Develop and implement cross-systems training initiatives on issues of mutual concern, including eligibility and intake procedures.
- Collect and disseminate information on agency training activities related to vocational rehabilitation and related services.

In addition to the activities of the State Interagency Council on Vocational Rehabilitation, VESID is coordinating a number of other activities with State Agencies. The following presents a brief overview of those major activities:

Division of Veterans' Affairs: The State Division of Veterans' Affairs (DVA) is responsible for the coordination of all benefits provided to veterans in New York State, whether provided by Federal, State, or county agencies. It also provides direct veterans' counseling services to enable veterans to access all benefits, including vocational rehabilitation. The Federal Veterans' Affairs Vocational Rehabilitation Program assists veterans with service connected disabilities and eligible dependents to obtain and maintain suitable employment or, for certain veterans, to achieve maximum independence in daily living.

VESID and the Federal and State Veterans' Affairs Offices coordinate and integrate services for veterans with disabilities. Joint delivery of services is being negotiated with the Federal Department of Veterans' Affairs to expand the number of veterans with disabilities able to benefit from resources available to both agencies.

Office of Mental Health: The Office of Mental Health (OMH) is responsible for providing programs and services to individuals with mental illness in New York State. The agency provides services in the areas of research, prevention, care, treatment, rehabilitation, education, and training. OMH operates psychiatric hospitals and administers a wide range of community-based programs and services through five regional offices in cooperation with local governments and community organizations and agencies. OMH provides many psychiatric rehabilitation programs that are similar in nature to VESID programs. VESID provides services to consumers under the care of OMH through case services, sheltered employment, and supported employment. OMH is a cosigner of the State's Memorandum of Agreement for Supported Employment.

During the past year, VESID and OMH convened a training design workshop under the direction of the Matrix Research Institute (MRI), which included VESID and OMH staff, executives from a representative array of provider agencies, and primary consumer and family members. The purpose of the working session was to develop and examine models for an effective integration of the best features of VESID supported employment and OMH special employment programs serving persons with serious mental illness.

In the fall 1991, OMH and VESID will be initiating five regional Systems Integration Projects that will serve as a testing ground for needed revisions in each system. Locally developed and managed, these programs will use a variety of available resources to meet the multiple needs of individuals with severe and persistent mental illness through an integration of intensive psychiatric rehabilitation program, other related health services and vocational rehabilitation and educational services.

Office of Mental Retardation and Developmental Disabilities (OMRDD): This agency is responsible for providing a full continuum of care for individuals with developmental disabilities in New York State. OMRDD ensures the development of community-based programs and services including care, treatment, day services, rehabilitation, education, and training. OMRDD is a cosigner of the State's Memorandum of Agreement for Supported Employment. VESID provides services to consumers under the responsibility of OMRDD through case services, sheltered employment, and supported employment.

OMRDD and VESID have established clear roles and responsibilities related to supported and sheltered employment. VESID has been designated as being responsible for the administration and development of the intensive component of supported employment, with OMRDD designated as being responsible for providing ongoing extended services for individuals with developmental disabilities. VESID is responsible for the monitoring of individuals in sheltered employment programs, while OMRDD is responsible for the administration and development of sheltered employment in New York State. The transfer of responsibilities will be completed in July 1991.

Department of Labor: The New York State Department of Labor (DOL) is responsible for the operation of Job Service which is a placement service for employers and job seekers. In discharging this responsibility, DOL provides employment counseling, testing, job selection, and placement activities. In addition, the Department operates a special program which provides similar services to disabled veterans called the Disabled Veterans Outreach Program (DVOP). Job development is also a major focus of the agency.

The major focus of VESID activities with DOL is the coordination of placement services to individuals with disabilities and the development and implementation of relationships with employers. DOL has developed a new initiative called the Community Service Center (CSC) to enhance services to job seekers through outreach into the community and access to services of other agencies. VESID and DOL are jointly addressing the needs of unemployed individuals with disabilities by integrating VESID services with the Department of Labor's Community Service Centers, coordinating job placement, job development, and promotion activities. A major activity planned between the two agencies is the establishment of employment groups to enhance local planning and increase access to employment.

Division of Substance Abuse Services: The Division of Substance Abuse Services (DSAS) is responsible for planning, developing, administering, funding, and regulating a comprehensive statewide network of more than 400 substance abuse programs. Individuals in substance abuse treatment programs often experience severe impediments to employment.

VESID has worked intensively with DSAS to improve services to people with substance related disabilities. The major focus has been on the joint development of a statement of principles regarding referrals from DSAS to VESID. Developed by a work group of VESID staff members and providers of substance abuse services, these functional criteria for referrals will result in appropriate referrals from treatment programs and will facilitate the access of consumers to VESID services. Information provided in the referral process will also assist VESID in making more timely eligibility determinations, enable VESID to be responsive to the needs of substance abusers, and provide the necessary vocational assistance to prepare them for gainful employment.

In addition, VESID has also assisted DSAS in coordinating the developing relationship between DSAS and the Office for Special Education Services. This relationship will assist both agencies in determining the appropriate manner in which to provide education to youth residing in facilities operated or supervised by DSAS.

Division of Alcoholism and Alcohol Abuse: VESID and the Division of Alcoholism and Alcohol Abuse (DAAA) are working to complete a statement of principles related to referral for VESID services. When completed, these functional criteria will ensure appropriate referral and timely provision of services, as well as assist local staff of both agencies to work cooperatively in meeting the needs of the consumer.

Department of Civil Service: The Department of Civil Service (DCS) is the central personnel agency for the State of New York. In this capacity, the agency has programs directed at State employees with disabilities. Commonly referred to as the 55b and 55c programs, they provide noncompetitive positions in State service for individuals with disabilities and disabled veterans respectively. Assisting these individuals in accessing appropriate State jobs and working to return individuals disabled while in State service to productive employment are strong interests of the agency.

VESID and DCS are working together to insure that State workers who are injured on the job receive services to return to a job as quickly as possible. Through the Rehabilitation Management Services Program, VESID is providing the expertise necessary to assess injured workers' knowledge, skills and abilities and to assist in job placement and other rehabilitation activities based on individual needs.

Department of Correctional Services and Local Parole: The State Division of Parole maintains complete information on each inmate in an institution under the jurisdiction of the Department of Correctional Services and supervises and maintains records on every person on parole or conditional release. The Division of Parole assists inmates in securing educational or vocational training and employment.

VESID, working with the Department of Correctional Services (DOCS), developed an ex-offender pilot program with the local Division of Parole at the Wende Correctional Facility. The program provides a vocational component for the return of ex-offenders with mental retardation to the community as part of the prerelease planning process. The interagency program ensures that vocational needs and preparation are a key component of the overall preparation for successful rehabilitation in the individual's home community. When these individuals return to their community, planning between agencies continues.

New York City Department of Corrections: VESID, the New York City Department of Corrections (DOC), and State DSAS are discussing methods to improve access to services that could provide alternatives to incarceration for those individuals who have a drug-related disability and involvement with the criminal justice system.

Department of Health: Cooperative activities between VESID and the Department of Health (DOH) have focused on providing services for infants and toddlers with disabilities, ages birth to two, and on developing services for individuals with traumatic brain injury.

Currently, infants and toddlers with disabilities receive early intervention services through the State's Family Court system. However, New York State is developing a comprehensive interagency system of early intervention services in response to recently enacted Federal legislation. DOH has been designated as the lead agency to coordinate the development of this interagency system.

VESID has been working collaboratively with the New York State DOH and other State agencies, consumers, and service providers in planning for a comprehensive, coordinated interdisciplinary system of early intervention services for infants and toddlers with disabilities and their families. In addition, as part of an interagency agreement with DOH, a member of VESID staff has been funded by DOH to serve as a liaison person in working cooperatively in the planning of an early intervention system under Public Law 99-457.

The DOH has also been designated by the Governor as the lead agency for services to the traumatically brain injured. DOH established the New York State Head Injury Coordinating Council. This Council is charged with the responsibility of developing a coordinated, comprehensive and integrated service delivery system for this population. VESID serves as a member of the Council and has provided expertise in developing necessary vocational components as part of this comprehensive service delivery system, with emphasis on community reentry programs.

Activities Planned for 1992 to 1994

The activities planned for 1992 to 1994 to address interagency coordination will be accomplished through the State Interagency Council for Vocational Rehabilitation and through interaction with other State agencies and their local counterparts.

During 1992 to 1994, VESID will focus its interagency activities in the following areas:

- **Access to Services:** VESID will continue efforts to improve access to vocational rehabilitation and related services with emphasis on meeting the interagency services needs of individuals through the establishment of functional criteria within all relevant State agencies.

- **Linkages with Business, Industry and Labor:** VESID will continue efforts to expand the involvement of business, industry, and labor in accessing individuals with disabilities to meet their labor force needs.

- **Availability of Service Options:** VESID will increase integrated employment opportunities for individuals with disabilities in conjunction with other agencies and providers.
- **Cross-Agency Training:** VESID will provide training to improve skills, knowledge, and attitudes of the State's work force.
- **Funding Mechanisms:** VESID will continue to review the current funding mechanisms, levels, and financial limits on services in order to maximize available resources and simplify access to services for individuals with disabilities.
- **Integration of Mental Health and Vocational Rehabilitation Services:** VESID will implement five pilot programs to address the manner in which mental health and vocational rehabilitation services are best integrated in New York State for individuals with disabilities.

Evaluation: The State Interagency Council's annual report to the Governor and the Board of Regents outlining its activities, deliberations, and recommendations will provide an assessment of the interagency coordination of vocational rehabilitation activities.

PRIORITY 3: *Increase integrated employment options for individuals with disabilities*

Current Activities Related to This Priority

One of VESID's major goals is that of increasing integrated employment opportunities to ensure that individuals with disabilities are placed appropriately in the most integrated employment setting. These integrated employment activities will lead to an interagency system for the provision of supported employment services to individuals with severe disabilities across New York State.

A major focus for increasing integrated employment options is VESID's business and industry outreach program. The focus of this program is to develop major program initiatives with business and industry that significantly increase employment alternatives for persons with disabilities. This effort involves other organizational units within the State Education Department, service providers, government agencies, schools, consumers, unions, and major associations of business and industry, all focused toward achieving the following outcomes:

- Increase participation of people with disabilities in the work force.
- Target key industries for priority development based upon their ability to provide stable and secure employment opportunities, potential for promotion and job opportunities at all levels of employment.
- Create alliances with business and industry that will result in improved career and employment opportunities for people with disabilities. These alliances would be focused towards major companies that conduct business throughout New York State; associations that represent targeted segments of business and industry, including small businesses; and key employee unions at the State and local levels.
- Enhance the awareness of business and industry and the general public of the availability of people with disabilities as a work force to be tapped.
- Increase the capability of business and industry to respond to the consumer needs of people with disabilities.

In working toward achieving these new initiatives with business and industry, VESID will develop a number of approaches to creating new employment opportunities for people with disabilities. The focus will be to mobilize a network of key representatives from business and industry, schools, and other service providers that will enable people with disabilities to make career decisions based upon current occupational information, mentoring support from key industry representatives, and newly created trial work opportunities.

These approaches will also serve to assist adolescents with disabilities who are still in school to gain a clearer understanding of present and future employment opportunities. They may include:

- involving key representatives of business and industry, educators, and State Labor Department representatives in updating existing occupational information based upon current employment opportunities and industry standards;
- developing new work site training opportunities for people who have never worked in competitive employment at regular jobs in regular work settings;

- targeting industries that have a critical recruitment need for unskilled labor and providing the opportunity for them to recruit individuals presently not in competitive employment, or about to transition from school to work;
- developing the capability to market supported employment services directly to targeted industries;
- providing technical assistance and training to business and industry that will enable them to recruit workers with disabilities and effectively meet their work-related needs; and
- assisting companies to meet the needs of people with disabilities as consumers of their products or services.

Another major activity has been the development of an alliance between VESID and the New York State AFL-CIO. The alliance's goal is greater numbers of people with disabilities remaining employed and/or becoming employed in jobs covered by union contracts in New York. This alliance focuses on the following activities:

- Encouragement of training opportunities and apprenticeships for students with disabilities
- Provision of access for union members and their families to the services available through VESID
- Expansion of opportunities for union members and potential union members with disabilities to be gainfully employed.

Additional alliances and agreements are also being established. As these and other initiatives progress, VESID will continue to work cooperatively throughout the State to ensure increased employment opportunities for individuals with disabilities in integrated settings.

In keeping with VESID's objectives to provide integrated employment opportunities, supported employment serves as one of the major options for those individuals with severe disabilities who have had limited opportunities in the past. VESID administers funds to an extensive network of supported employment programs across New York State that provide intensive job skills training for individuals with severe disabilities. In addition, VESID also has responsibility for providing the ongoing support services necessary to maintain a job to those individuals who are not the responsibility of the Office of Mental Retardation and Developmental Disabilities or the Office of Mental Health.

The integrated employment activities will lead to an interagency system for the provision of supported employment services to individuals with severe disabilities across New York State. Funding was made available for the continuation and expansion of existing supported employment programs as well as the establishment of new programs. Specific emphasis was placed on addressing and assisting unserved or underserved individuals with severe disabilities in the following categories:

- autistic;
- developmentally disabled, including individuals at risk within the criminal justice system;
- individuals aging-out of special education programs;
- individuals designated as dual-diagnosed;
- learning disabled;
- legally blind;
- mental illness, including mentally ill chemical abusers;
- mentally retarded;
- sensory impaired, including deaf and legally blind;
- severely physically disabled; and
- traumatically brain injured.

Activities Planned for 1992 to 1994

Future VESID initiatives for increasing integrated employment options for individuals with disabilities are planned to achieve the following outcomes: increased employment opportunities for VESID consumers; supported employment placement opportunities; and career opportunities for future VESID consumers. During 1992 to 1994 VESID will focus its activities on the following areas:

- **Statewide Policy on Integrated Employment:** VESID will develop a statewide policy on integrated employment for individuals with disabilities which reflects the basic principles established to guide State agency staff in their planning and decision making.
- **Funding of Integrated Employment Opportunities:** VESID will develop recommendations regarding available resources for funding of supported employment and the

manner in which such resources may be developed, a uniform State funding methodology for supported employment, and creation of a single State contract for supported employment that will minimize the administrative burden on providers and State agency staff.

- **Consistent Roles, Responsibilities and Definitions:** VESID will develop accepted definitions of service components and appropriate roles and responsibilities for each State agency to improve the planning and delivery of supported employment services.

- **Consistent Standards:** VESID will develop consistent quality standards for services and staffing to ensure equitable treatment for individuals with disabilities.

- **Enhancing Opportunities for Job Coaches:** VESID will establish linkages with higher education to increase the availability of preservice options for job coaches.

- **Access for Underserved Populations:** VESID will continue efforts to enhance access to vocational rehabilitation for underserved populations.

- **Quality Assurance for Supported Employment Programs:** VESID will develop guidelines for supported employment programs, which will include quality measures, a quarterly reporting system and a monitoring protocol for on-site reviews to address quality assurance issues.

- **Supported Employment and Children with Disabilities:** VESID will review State and Federal laws for children with disabilities with the intent of determining impediments to supported employment as an educational training option supported by education funds.

- **Increase Involvement of Business, Industry and Labor:** VESID will develop incentives to business, industry, and labor that will encourage businesses to hire and train workers with disabilities and to assume financial responsibility for the provision of extended services.

Evaluation: Through the employment opportunities developed through VESID's initiatives with business and industry, the following benefits are expected to be provided for VESID's consumers: expanded career options, stable and secure future employment opportunities, improved wages, better employer provided health benefits, and a fair competitive structure for advancement. Through VESID's Management Information System, the number of placements, individual salaries, positions, etc. can be tracked and evaluated. VESID Quality Assurance staff will monitor, maintain data and evaluate supported employment programs to determine whether such programs have the ability to place individuals with severe disabilities into integrated work environments.

PRIORITY 4: *Foster independent living services for individuals with disabilities in communities*

Current Activities Related to This Priority

The Office of Vocational and Educational Services for Individuals with Disabilities and the State Independent Living Council work cooperatively to expand independent living services in New York State. During 1990, VESID provided technical support to the State Independent Living Council to develop a Five-Year Plan for Independent Living in New York State. The plan provides VESID with guidance in service expansion, centers' increased linkages with other State agencies, the integration of independent living into all aspects of the vocational rehabilitation process, and increased funding options for independent living centers.

Independent living in New York State is fostered through Independent Living Centers (ILCs) which are community-based, nonresidential, nonprofit organizations that promote independent living for persons with disabilities. The centers' boards of directors are comprised of a majority of individuals with disabilities. Preference in hiring is given to qualified persons with disabilities who are able to share their disability-related experience with others. In addition to providing direct services, which include peer counseling, information and referral, housing assistance, and benefits advisement, ILCs advocate on the local, State, and national levels for the removal of architectural, attitudinal, and programmatic barriers that impede the full participation in society by people with disabilities.

During the last 10 years, New York's independent living program has grown from 5 centers receiving less than $500,000 to a network of 34 centers, with annual State and Federal appropriations totaling $8.5 million. An additional center in the Harlem area of New York City is being established this year as a result of a grant award to VESID by the Rehabilitation Services Administration. The new center is intended to serve as a model for the development of future centers in similar urban areas of the State. New York's program is now far more extensive than that of any other state and is viewed as a national model. Last year, New York State's 34 independent living centers provided direct services to more than 27,000 consumers with disabilities and reached almost 83,000 individuals through community awareness programs. A list of Independent Living Centers in New York State is contained in Appendix D.

Much of the progress of independent living programs may be attributed to the strong support of the program within the Legislature. Approximately 75 percent of all monies allocated to independent living in New York has been provided by State funding. The State Education Department is committed to independent living as an integral component of meeting the needs of people with disabilities. Enhancing independent living is an organizational priority for VESID, and the office is vigorously pursuing legislative and fiscal strategies to expand the program.

VESID provides technical support to all independent living centers in New York State. The VESID Centers Unit surveyed independent living center executive directors, board members, and staff to determine their respective needs for training. Together they are in the process of identifying training needs to be implemented in 1991-1992.

VESID and the ILCs developed standards for all centers in New York State. *The Standards for Independent Living Centers* represent the minimum requirements for the operation and delivery of services by centers. These standards are built upon the recognition of consumers as the focus of service planning and upon the role of ILCs as leading advocates of accessibility and consumer rights within their communities.

The implementation of these standards must be responsive to the local needs of the community in which consumers live. Therefore, implementation guidelines are provided as examples of how centers may choose to comply with a given standard. Each center will be required to develop, within its own program, a concise plan for meeting the minimum levels established in these standards.

Activities Planned for 1992 to 1994

The Office of Vocational and Educational Services for Individuals with Disabilities is committed to fostering the development of independent living services in New York State during the next three years. Particular emphasis will be placed upon developing such services in urban and rural areas across the State to increase access for individuals with disabilities who have been previously underserved. This would include individuals with disabilities who are members of ethnic and linguistic minority groups. During 1992 to 1994 VESID, in cooperation with the State Independent Living Council, will work to accomplish the following:

- **Expanded School Role:** VESID will expand the role of Independent Living Centers in schools throughout New York State, increase services to students with disabilities in these schools as they prepare to exit the educational system, and increase the awareness of such students, their families, teachers, and peers of independent living services and programs.

- **Underserved Populations:** VESID will expand independent living services to underserved individuals who are members of ethnic and linguistic minority groups, or who live in geographic regions of the State that do not have such services available. In addition, VESID and the Division of Substance Abuse Services (DSAS) will work with ILCs to improve access to substance abuse system services between ILCs and DSAS.

- **Technical Assistance:** VESID will provide increased technical assistance to Independent Living Centers to help centers provide consistency and quality in the delivery of services in accordance with established standards. Technical assistance will also be provided in the areas of service delivery, Federal and State funding, sound fiscal practices, linkages with other agencies, advisory board development, personnel practices and other issues as requested.

- **Americans with Disabilities Act:** VESID will provide community support and technical assistance on the implementation of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990.

- **Supported Employment:** VESID will encourage involvement of ILCs in supported employment efforts to facilitate a growing partnership between ILCs and supported employment programs.

- **Cooperative Relationships:** VESID will develop improved referral systems and cooperative relationships with Independent Living Centers.

- **Training:** VESID will develop joint training programs for vocational rehabilitation counselors and Independent Living Center staff to promote a closer working relationship and understanding between the VESID District Offices and the Independent Living Centers.

Evaluation: In keeping with the requirements of Section 711 (c) of the Rehabilitation Act, VESID monitors and evaluates the Independent Living Centers funded under Title VII Parts A and B. In addition, the State Independent Living Advisory Council will work cooperatively with VESID in implementing the Five-Year Plan for Independent Living in New York State.

PRIORITY 5: Improve access for individuals with disabilities to vocational rehabilitation services

Current Activities Related to This Priority

During the past year, VESID has concentrated on methods to improve access to services offered to persons with disabilities. A plan was developed to improve access based on VESID's Philosophy of Services. Each district office established an access committee comprised of management, support, and professional staff to identify local impediments to consumer access. The committees completed an examination of their respective local office practices that might impede access to services and proposed solutions to overcome these impediments.

The plan to improve access was designed to ensure that consumers will receive needed services as quickly as possible. The new process of service delivery will involve only the steps necessary to achieve the goals established for each consumer. VESID is also working towards making all policies and procedures readily accessible and easily understood.

The application procedures have been redesigned to reflect the mission and philosophy of the agency and the recommendations of the State Interagency Council on Vocational Rehabilitation. As a part of this process, all referral and intake forms were revised to eliminate duplicative or unnecessary forms and procedures. New policies were developed on intake, eligibility, disability assessment and planning for services to provide consistent application of VESID's philosophy across all offices. The policies direct counselors to use existing evaluations, including those performed by other agencies wherever possible, and to avoid unnecessary assessments in those cases where the disability is either evident or already documented.

Quality assurance is a key component in improving access to services. A service review process was developed for investigating and resolving complaints or inquiries about VESID services from individuals with disabilities, their families, or representatives. The process was designed to respond quickly to the concerns of consumers and to ensure that quality services are being provided.

In addition, a case review process was developed as a mechanism for monitoring service delivery throughout the State. The process, which involves reviews of random samples of District Office case files, is designed to ensure that services provided through VESID are in accordance with policy, State and Federal regulations, guidelines and standards consistently throughout the State. The case review process is now an integral part of the professional management of each District Office. The goals of this case review process are to:

- ensure that rehabilitation services are being provided to VESID consumers in the most expeditious manner;
- ensure that appropriate rehabilitation services, including counseling, are being provided in accordance with policy and procedure;
- verify that case recording reflects the quality of counseling being provided;
- encourage supervisory participation in case management;
- facilitate continuity in case service delivery;
- monitor consistency in the application of policy;
- ensure that cost-effectiveness exists; and
- identify additional supervisory and staff training needs.

Training is also a primary element in improving access to services. In coordination with the Rehabilitation Services Administration, Regional Rehabilitation Continuing Education Program, Rehabilitation Administration and Management Programs, and colleges and universities which provide preservice rehabilitation training, VESID provides ongoing training to vocational rehabilitation counselors in New York State on a wide variety of issues. In fiscal year 1990-1991, training was provided on such issues as fair hearings, the Americans with Disabilities Act, economic need policy, supported employment, similar benefits, functional criteria, and new policies in improving access to services.

VESID, through its Training and Outreach Unit, has increased public relations activities through the dissemination of relevant media materials and publications. These materials have been translated into several languages. VESID is also exploring the use of public and commercial television and satellite systems to disseminate information about the agency.

Activities Planned for 1992 to 1994

During 1992 to 1994, VESID will continue to improve vocational rehabilitation services by doing the following:

- **Training:** VESID will implement a comprehensive training program for all vocational rehabilitation counselors on the revised access policies.

- **Policy Revision:** VESID will review and revise, as appropriate, all policies and procedures from the time an Individualized Written Rehabilitation Plan is developed for a person with a disability until the person no longer needs services.
- **Integrated Employment:** VESID will continue to foster integrated employment options for individuals with disabilities within all regions of the State.
- **Underserved Populations:** VESID will continue to expand outreach to underserved populations, including individuals from minority or ethnic groups and individuals previously underserved by the vocational rehabilitation system.
- **Enhancement of the Vocational Rehabilitation Process:** VESID will enhance the vocational rehabilitation process to ensure that, as a result of this process, people with disabilities lead more independent lives.
- **Regional Planning:** VESID will enhance the regional planning process to ensure that services provided to individuals with disabilities are coordinated, integrated and nonduplicative.

Evaluation: The use of the case review process within VESID and the analysis of data collected through the management information system will be the principal evaluation mechanisms to determine if the access policies are having the desired impact on the delivery of services for individuals with disabilities.

PRIORITY 6: Improve program and fiscal management of the Office of Vocational and Educational Services for Individuals with Disabilities

Current Activities Related to This Priority

VESID has developed a quality assurance protocol for monitoring Independent Living Centers, rehabilitation facilities, and individuals in long-term sheltered employment. These protocols have been developed as a result of an interactive process with individuals with disabilities, service providers, State agencies and advocacy organizations. The following describes each of these monitoring protocols.

Monitoring of Long-Term Sheltered Employment: VESID has the responsibility of monitoring individuals in long-term sheltered employment in order to ensure that an evaluation has been conducted for each individual and that placement in long-term sheltered employment is the most integrated work setting. This is consistent with the Department's responsibilities under State and Federal statutes.

In conjunction with representatives of major provider groups and the Office of Mental Retardation and Developmental Disabilities, VESID has developed a quarterly reporting system. This system, which was implemented on April 1, 1990, provides VESID with quarterly statistics from each facility relating to individual workers who have entered, exited and have had their annual evaluations conducted. In addition, an on-site monitoring protocol was developed and implemented. It is anticipated that at least 20 facilities will be reviewed between February 1990 and February 1991.

Monitoring of Independent Living Centers: The Monitoring Unit and the Centers Unit within VESID are working in conjunction with representatives from the Independent Living Centers to develop a revised quarterly reporting format and protocol for on-site monitoring. It is anticipated that this material will be ready for implementation beginning July 1, 1991 and will consider requirements of State and Federal statutes and regulations and State guidelines and standards.

Monitoring of Rehabilitation Facilities: VESID is working in conjunction with representatives from major providers in New York State in developing standards for the major types of services which are being provided by rehabilitation facilities. This includes standards for diagnostic vocational evaluations, personal/work adjustment training and specialized vocational training. An advisory group was convened in the spring 1990 and has recently provided VESID with recommendations. Its suggestions are currently under review by VESID. The scope of such standards and time lines for development will be delineated as part of the review process by VESID.

Contract Development and Implementation: For the first time, multiyear contracts were developed and executed for the majority of services purchased by VESID from not-for-profit organizations. This process simplifies the annual renewal process, ensuring cash flow to service providers and reducing service delays.

Office Automation: The automation of the district offices and central office will reduce the time and effort required to document and administer the delivery of services by VESID. The installation of automation for support staff at all district offices was completed. This equipment created greater efficiency in operations such as data access and word processing, which improved services to individuals with disabilities.

Activities Planned for 1992 to 1994

During the next three years, VESID will continue to improve the program and fiscal management of the Office through the following activities:

- **Quality Assurance:** VESID will develop and implement on-site monitoring protocols for all programs and services for individuals with disabilities.

- **Central Budgeting and Reporting:** VESID will develop a centralized budgeting and expenditure reporting process to provide fiscal accountability for each of the major organizational units in VESID.

- **Technology Plan:** VESID will provide enhanced use of technology and automation in the administration and development of services.

- **Unified Contracts:** VESID will complete the implementation of the unified service contract system to bring all rehabilitation facility services under the contract process.

- **Management Information System:** VESID will review the Management Information System to ensure that appropriate data are available to VESID staff for program planning purposes.

Evaluation: During the next three years, VESID will be implementing each of the above described monitoring protocols, evaluating the effectiveness of each and revising these protocols as needed. In addition, VESID, in cooperation with the New York State Division of the Budget, will evaluate the contract process to ensure that appropriate contracts are implemented and monitored in a timely manner.

IV. VESID/OSES Coordination

The New York State Education Department has a leadership role in the provision of services to individuals with disabilities of all ages. These services are provided to school age children with disabilities through the Office for Special Education Services (OSES) and to adults with disabilities through VESID. This section describes the activities VESID and OSES have conducted to coordinate educational and vocational services for individuals with disabilities.

Current Activities

During fiscal year 1990-1991, staff members of OSES and VESID met to establish plans for cooperative activities between their two offices. Activities were prioritized and contact persons were identified for the development of activities to accomplish those priorities. In addition, there have been regularly scheduled meetings to address the progress of the activities to insure ongoing communication. The following is a description of the areas focused upon by the two offices, including educational linkages, interagency coordination, and database integration.

- **Coordination of Requests for Proposals:** OSES provided assistance to VESID in the development of the Supported Employment Request for Proposal (RFP) distributed in April 1990. This RFP provided funding to establish and expand supported employment services for individuals with severe disabilities. Special consideration was given to proposals which served students with disabilities in secondary education programs and/or pupils exiting such programs.

- **Development of Joint Funding Proposals:** VESID, the Office of Mental Health, and OSES submitted a funding proposal to the United States Department of Education for a Statewide Demonstration Project on providing supported employment services for individuals with chronic mental illness. An additional proposal designed to implement a statewide systems change on secondary and transition services for youth with disabilities was submitted by VESID and OSES in May 1991.

- **Statewide Plenary Institute:** The Statewide Plenary Institute was held in July 1990 for coordinators of services for students with disabilities at two-year and four-year degree granting institutions. This institute was held to enable such coordinators to begin networking on issues related to students with disabilities and identify issues which need to be addressed regionally.

- **Community College Transition Project:** The Community College Transition Project, which was initiated by OSES, continues to be implemented in community colleges throughout the State. This project was a cooperative effort of college and high school staff, Special Education and Resource Centers, and VESID at each site to assist secondary students with disabilities make a successful transition from high school to community college.

- **University Leadership Institutes:** VESID, OSES, and the Office of Higher and Continuing Education annually conduct University Leadership Institutes. These institutes bring faculty from college/university programs for special educators and vocational rehabilitation counselors together to discuss issues pertaining to delivery of education and rehabilitation services for individuals with disabilities.

- **New York City Schools:** VESID is working with the New York City Board of Education, New York City School District, OSES, and New York Working to improve the linkage of services among these programs and agencies. A formal linkages agreement is being developed. A Vocational Focus Group has been established to ensure the implementation of transitional activities in New York City.

- **Coordination of State Plans:** VESID and OSES are working on a long-term goal of integrating the State Plan for Vocational Rehabilitation and Supported Employment and the New York State Plan for Education of Students with Disabilities. This integrated planning has begun with the development of this document as a companion to the OSES State Plan.

- **Database Coordination:** The sharing of data collected by OSES and VESID is essential to the comprehensive planning for students with disabilities as they transition between service systems. VESID and OSES have begun planning for the integration of data collected by both offices related to students with disabilities. Initial activities, which occurred during the fall of 1990, focused on sharing of information from the Report of Handicapped Children and Youth Exiting the Educational System (1989-90), Anticipated Services Needed by Exiting Handicapped Children and Youth (1990-91 School Year) and the Vocational Rehabilitation 911 Reporting Format which reports on all case activity for individuals served by VESID.

- **Regional Interagency Planning Groups:** OSES and VESID are working at the regional level to enhance local planning for individuals with disabilities. OSES has funded several projects at the regional level to enhance local planning for individuals with disabilities and has shared information about these projects with VESID. A series of meetings have occurred regionally to identify the purpose and direction of regional interagency planning groups and to support such groups in local planning activities.

- **Supported Employment for School-Age Youth:** VESID and OSES are reviewing the manner in which supported employment services can be made available to students with disabilities throughout the State.

- **Services to Youth with Traumatic Brain Injuries:** Ongoing involvement of OSES and VESID staff has occurred with State level coordinating councils to address issues related to the transitioning of youth with traumatic brain injuries to adult services. OSES has implemented a statewide training program on the education of children with traumatic brain injury. VESID has reviewed this training package to determine its benefit in assisting the development of appropriate programs for adults with traumatic brain injuries.

- **Welfare Reform Initiatives and Children in Day Care:** VESID has worked with OSES to discuss the impact of the Department of Social Services' (DSS) Job Opportunities and Basic Skills Training Program (JOBS) on the school system. This has been in cooperation with the Office of Continuing Education (OCE), which is providing a percentage of the day-care services to JOBS participants.

- **Ongoing Communication Between VESID and Schools:** OSES has agreed to assist VESID in assuring effective communication with school districts concerning adult services. Use of the Special Education Training and Resource Centers (SETRC) system and other forms of information dissemination are being investigated.

Planned Activities for 1992 to 1994

The following describes the activities planned for 1992 to 1994 between VESID and OSES:

- **Database Integration:** VESID and OSES plan to coordinate data collection through sharing of biographic, demographic and evaluation information on individuals with disabilities. This system will provide the means by which data will be relayed among schools, BOCES, service providers, and VESID district offices. Projects to provide the sharing of this data include:

    - The electronic linking of VESID district offices to schools and BOCES through VESID's UNISYS Network and BOCES' IBM Professional Office System (PROFS) Network.

    - The VESID-United Cerebral Palsy (UCP) Technology Linkage Project, which will provide an electronic link among VESID offices, schools, and UCP associations statewide.

    - VESID's Southern Tier Technology Pilot Project, which will provide the telecommunication linkage among select Independent Living Centers, Associations for Retarded Citizens, rehabilitation facilities, schools, BOCES, and VESID district offices.

  - New York City Board of Education training on d-Base for New York City VESID offices, so that New York City offices are able to receive Individualized Education Program (IEP) d-Base information from select New York City schools.

  - Training for VESID counselors on the Part 200 system and relevant portions of the Part 100 Regulations which pertain to general education, so that they can better coordinate services for students with disabilities as they leave school.

  - Participation in the New York City Cooperative Data Initiatives Council with OSES, OMRDD, CBVH, and other agencies and offices to establish a standard method of exchanging student information between New York City schools and State Education Department offices related to the student aging out process and regulations.

- **Supported Employment for School-Age Youth:** VESID and OSES will pursue the development of supported employment activities for school age youth. This is an activity that has been addressed by the State Interagency Council for Vocational Rehabilitation as a significant statewide need. Successful implementation of this concept will require the efforts of both offices.

- **Youth with Traumatic Brain Injury:** VESID will provide ongoing involvement with State level coordinating councils to address issues related to transitioning traumatically brain injured youth to adult services.

- **Linking Services for Students with Disabilities:** VESID and OSES will continue, with other Department offices, to implement the 10 policies on linking services for students with disabilities.

V. APPENDICES

This State Plan narrative has described the priorities of the Office of Vocational and Educational Services for Individuals with Disabilities for Federal Fiscal Years 1992 to 1994. Attached is a set of appendices which provides State Assurances (Appendix A) and a description of services and planned activities for vocational rehabilitation and supported employment (Appendix B - Attachments for Title I and Title VI, Part C). The Assurances and Attachments provide basic State Plan information, as required by the Rehabilitation Act. They also provide more detailed information regarding the State program of vocational rehabilitation and supported employment.

Appendix A

Required State Assurances

State New York **Combined** ______ **General** X **Blind** ______

Three-Year State Plan for the Vocational Rehabilitation Services Program and State Plan Supplement for the Supported Employment Services Program Under the Rehabilitation Act of 1973, as Amended

FY 1992 - FY 1994

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Three-Year State Plan Covering Fiscal Years 1992, 1993 and 1994 for the Vocational Rehabilitation Services Program and State Plan Supplement for the Supported Employment Services Program Required Under the Rehabilitation Act of 1973, As Amended 1/

State: New York

Type of Agency: Combined ______ General X Blind ______

Section 1: Legal Basis and State Certifications

1.1 The New York State Education Department is
(Name of Sole State Agency or Designated State Unit)
authorized to submit this Title I State plan and its supplement.

1.2 As a condition to the receipt of Federal funds under Title I of the Act 2/ for vocational rehabilitation services, the New York State Education Department
(Name of the Sole State Agency)
3/ agrees to administer the vocational rehabilitation program in accordance with the provisions of this State plan 4/, the Act, and all applicable regulations 5/, policies and procedures established by the Secretary.

1/ Public Law 93-112, as amended by Public Laws 93-516, 95-602, 98-221, 99-506. and 100-630.

2/ Unless otherwise stated, "Act" means the Rehabilitation Act of 1973 (P.L.93-112), as amended.

3/ All references in this plan to "sole State agency" or to "the State agency" relate to the agency identified in this paragraph.

4/ No funds under Title I of the Act may be awarded without an approved State plan in accordance with 29 USC 721 and 34 CFR Part 361.

5/ Applicable regulations include the Education Department General Administrative Regulations (EDGAR) in 34 CFR Parts 76, 77, 78, 79, 80, 81, 82 and 85 and the State Vocational Rehabilitation Services Program Regulations in 34 CFR Part 361.

1.3 As a condition to the receipt of Federal funds under Title VI, Part C of the Act for supported employment services, the Office of Vocational and Educational Services for Individuals with Disabilities. (Name of Designated State Unit) 6/ agrees to administer the supported employment program in accordance with the provisions of the supplement to this State plan 7/, the Act, and all applicable regulations 8/, policies and procedures established by the Secretary.

1.4 The sole State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding this State plan and its supplement.

1.5 The State statutory authority for administration by local agencies is Article 21, New York State Education Law, Section 1004.

1.6 The State legally may carry out each provision of the plan and its supplement.

1.7 All provisions of the State plan and its supplement are consistent with State law.

1.8 The Commissioner of Education
(Title of State Officer)
has the authority under the State law to receive, hold and disburse Federal funds made available under this State plan and its supplement.

1.9 The Executive Deputy Commissioner
(Title of State Officer)
has the authority to submit this State plan for vocational rehabilitation services and the State plan supplement related to supported employment services.

1.10 The sole State agency has adopted or otherwise formally approved this State plan and its supplement.

6/ All references in this plan and its supplement to "designated State unit" relate to the agency identified in this paragraph.

7/ No funds under Title VI, Part C of the Act may be awarded without an approved Title I State plan supplement in accordance with 29 USC 795 j-q and 34 CFR Part 363.

8/ Applicable regulations include the EDGAR citations in footnote 5, portions of 34 CFR Part 361, and 34 CFR Part 363.

The effective date of this three year State plan and its supplement is October 1, 1991.

Thomas E Sheldon
(Signature)

Thomas E. Sheldon
(Typed Name of Signer)

Executive Deputy Commissioner of Education
(Title)

6/27/91
(Date)

TITLE I STATE PLAN FOR VOCATIONAL REHABILITATION SERVICES

Section 2: Plan Submittals

2.1 Consolidated Plans (Sec. 6 and 34 CFR 361.2(d))

This is a consolidated State plan which includes:

a. vocational rehabilitation and independent living:
_____ Yes __x__ No

b. vocational rehabilitation and developmental disabilities: _____ Yes __x__ No

c. vocational rehabilitation, independent living and developmental disabilities: _____ Yes __x__ No

If either 2.1.b. or 2.1.c. is answered in the affirmative, Attachment 2.1A contains a statement of concurrence of the State Developmental Disabilities program. (Sec. 6 and 34 CFR 361.2(d)).

2.2 Services to Persons with Visual Disabilities
(Sec. 101(a)(1)(A) and 34 CFR 361.2(c) and 34 CFR 361.19(a) and (d))

a. This plan encompasses vocational rehabilitation services for only persons with visual disabilities:
_____ Yes __X__ No

b. The designated State unit maintains criteria relating to visual disability distinguishing the responsibilities of the General and Blind agencies:
__x__ Yes _____ No _____ N/A

c. If there is an affirmative assurance identified in 2.2.b., the designated State unit has established reciprocal referral services with the other designated unit in the State; utilizes the services and facilities of the other agency to the extent feasible; jointly plans activities to improve services to individuals with handicaps in the State, and otherwise cooperates with the other agency to provide more effective services.

2.3 Frequency of Submittals (Sec. 101(a) and 34 CFR 76.140-142, 34 CFR 361.2(b)(1) and 34 CFR 361.3)

The State plan is submitted for approval every three years by July 1 of the year preceding the first fiscal year for which the State plan is submitted. State plan amendments are submitted whenever there is a significant and relevant change in the information or the assurances in the plan; the administration or operation of the plan; or the organization, policies or operations of the State agency.

2.4 Opportunity for Review and Comment Under State Review Process (34 CFR 79.8)

If the State plan or amendment to the State plan is subject to the State review process, such materials are reviewed and commented on in accordance with the provisions of Executive Order 12372. Comments provided by the State review process will be transmitted to the Rehabilitation Services Administration.

2.5 State Plan and Other Policy Development Consultation (Secs. 101(a)(18), and 101(a)(23) and 34 CFR 361.18)

a. Public Participation in State Plan Development

The State unit, after appropriate and sufficient notice, conducts public meetings throughout the State to allow interested groups, organizations and individuals the opportunity to comment on the State plan and to participate in the formulation of policies governing the provision of vocational rehabilitation services under the State plan.

Attachment 2.5A provides a summary of the public comments and the State unit's response to those comments.

b. The State unit has established and maintains a written description of procedures used to obtain and consider views on State plan development and policy development and implementation.

c. Public Access

The State unit makes available to the public for review and inspection a report of activities undertaken in the area of State plan and policy development as well as a summary of comments submitted at the scheduled public meetings and the State unit's response to these comments.

Effective Date:

October 1, 1991

d. Consultation with Indian Tribes and Tribal Organizations and Native Hawaiian Organizations

As appropriate, the State unit actively consults with Indian tribes and tribal organizations and native Hawaiian organizations that represent significant number of individuals with handicaps within the State in the development of the State plan for vocational rehabilitation services.

e. Other Consultation

The State unit seeks and takes into account, in connection with matters of general policy development and implementation arising in the administration of the State plan, the views of current or former clients vocational rehabilitation services, or, as appropriate, their parents, guardians or other representatives; providers of vocational rehabilitation services and others interested in vocational rehabilitation.

2.6 Acceptable Plan for Supported Employment (Sec. 101(a)(25) and 34 CFR 361.2(b)(1)(iii))

The State has an acceptable plan pertaining to the State Supported Employment Services Program authorized under Title VI, Part C of the Act.

Section 3: Agency Organization

3.1 Type of Sole State Agency (Sec. 101(a)(1) and 34 CFR 361.5(b) and (c))

The sole State agency is: (check appropriate item)

a. ____ a State agency primarily concerned with vocational rehabilitation, or vocational and other rehabilitation of individuals with handicaps.

b. _X_ the State agency administering or supervising the administration of education or vocational education in the State.

c. ____ a State agency that includes at least two other major organizational units, each of which administers one or more of the State's major programs of public education, public health, public welfare, or labor.

Effective Date:

October 1, 1991

3.2 Organization and Functions of the Sole State Agency and Designated State Unit (Sec. 101 (a)(1) and (2) and 34 CFR 361.5(e), 34 CFR 361.6 and 34 CFR 361.8)

a. Attachment 3.2A gives a brief description of the organizational structure of the State agency, including a description of its organizational units, the programs and functions assigned to each, and the relationships among these units within the State agency. Included are organizational charts that reflect (1) the State agency's relationship to the Office of the Governor and to other agencies administering major programs of public education, public health, public welfare, or labor of parallel structure within State government; (2) the internal structure of the State agency; (3) the internal structure of the designated State unit, if applicable; (4) all vocational rehabilitation functions for which the State agency is responsible, and (5) clear lines of administrative and supervisory authority.

b. All decisions affecting eligibility for, the nature and scope of and the provision of vocational rehabilitation services, are made by the State agency through its designated State unit, or by a designated vocational rehabilitation unit of a local agency under the supervision of the designated State unit. This responsibility is not delegated to any other agency or individual.

c. If the sole State agency is the type described in Section 3.1(b) or (c), the name of the designated State unit responsible for operation of the vocational rehabilitation program under this plan is: Office of Vocational and Educational Services for Individuals with Disabilities.

d. The designated State unit:

1. is primarily concerned with vocational rehabilitation, or vocational and other rehabilitation of individuals with handicaps, and is responsible for the State agency's vocational rehabilitation program, including the determination of the nature and scope of and provision of vocational rehabilitation services under this State plan;
2. has a full-time director; and

3. has a staff employed on such rehabilitation work, all or substantially all of whom are employed full time on such work.

e. The designated State unit is located at an organizational level and has an organizational status within the State agency comparable to that of other organizational units, in accordance with the provisions of 34 CFR 361.6(c).

f. There is a full time State director who directs the State agency specified in 3.1(a) or the designated State unit named in 3.2 (d).

3.3 Local Administration of Vocational Rehabilitation Program (Secs. 101(a)(1)(A) and 7(9), and 34 CFR 361.9)

a. The State plan is administered by one or more sole local agencies each of which is responsible through the designated State unit for the administration of the program within the political subdivision it serves. _____ Yes __X__ No.

b. Any local administration of the State plan by a sole local agency is based on a written agreement between the local agency and the designated State unit with the concurrence of the State agency and is in accordance with the provisions of 34 CFR 361.9(a).

c. One or more separate local agencies serving the blind, under the supervision of the designated State unit for the blind, administers that part of the plan relating to vocational rehabilitation of the blind. ___ Yes __X__ No.

3.4 Statewideness (Secs. 101(a)(4), and 101(a)(1)(A), and 34 CFR 361.2(a), 34 CFR 361.11 and 34 CFR 361.12)

a. The State plan is in operation in all political subdivisions of the State.

b. One or more waivers of Statewideness are in effect under this plan for carrying out State agency vocational rehabilitation activities in one or more political subdivisions through local financing in accordance with 34 CFR 361.12. _____Yes __X__ No. If affirmative, Attachment 3.4(b)A identifies the types of activities carried out under such waivers which conform to the provisions of 34 CFR 361.12(b).

c. The Secretary has approved a request under 34 CFR 361.11 for a special joint project or program involving shared funding and administration as described in Section 10.7 of this State Plan and has waived the requirement that the State plan must be in effect in all political subdivisions of the State.
______Yes __x__ No.

Section 4: Personnel Administration

4.1 Affirmative Action Plan for Individuals with Handicaps (Sec. 101(a)(6) and (7)) and 34 CFR 361.15)

The State unit has developed and implemented a plan to take affirmative action to employ and advance in employment qualified individuals with handicaps.

4.2 Staffing (Secs. 101(a)(2)(A)(iii) and 101(a)(7) and 34 CFR 361.14

Staff in sufficient numbers and with appropriate qualifications is available to carry out all functions required under 34 CFR 361.14.

4.3 Participation in Political Activity (5 USC 1501 et seq. and 5 CFR Part 151 et seq.)

The State agency, if other than an education agency, prohibits staff employed in the day to day administration and operation of the vocational rehabilitation program from engaging in political activity prohibited by the Hatch Act.

4.4 Special Communication Needs Staffing (Sec. 101(a)(7) and 34 CFR 361.14 (b))

The designated State unit includes on its staff or makes available (1) personnel able to communicate in the native languages of applicants for service and State unit clients with limited English speaking ability from ethnic groups which represent substantial segments of the population of the State, and (2) personnel able to communicate in special modes of communication such as manual, tactile, oral, and non-verbal communication devices, with applicants for service and State unit clients who rely on these special modes.

4.5 Staff Development (Sec. 101(a)(7) and 34 CFR 361.16)

There is a program of staff development for all classes of positions which are involved in the administration and operation of the State agency's vocational rehabilitation program in accordance with the provisions of 34 CFR 361.16.

Section 5: Financial Administration

5.1 Source of State Funds (Sec. 7(7) and 101(a)(3), 34 CFR 361.2(a) and 34 CFR 361.76)

State funds expended for this program to meet the non-Federal share consist only of State appropriated funds, funds made available by allotment or transfer from another unit of State or local government or funds otherwise described in 34 CFR 361.76.

5.2 General Administrative and Fiscal Requirements (Secs. 101(a)(6)(A), 11 and 12(c), 34 CFR Parts 76 and 80, and 34 CFR 361.24

The State agency has adopted policies and methods pertaining to the fiscal administration and control of the vocational rehabilitation program in accordance with the provisions of 34 CFR Parts 76 and 80 and 34 CFR 361.24.

Section 6: Scope of State Unit Program

6.1 Vocational Rehabilitation Services for Individuals (Secs. 101(a)(8) and 103(a), and 34 CFR 361.1, and 34 CFR 361.42)

a. The following vocational rehabilitation services identified in 34 CFR 361.42(a) are available to individuals, on an as needed basis:

1. evaluation of rehabilitation potential;
2. guidance, counseling, and referral;
3. physical and mental restoration services;
4. vocational and other training services;
5. maintenance;
6. transportation;
7. services to family members of individuals with handicaps if necessary to the vocational rehabilitation of the individual;

8. interpreter services and note taking for deaf individuals and tactile interpreting for deaf-blind individuals;
9. reader services, rehabilitation teaching services, note-taking services, and orientation and mobility services for blind individuals;
10. telecommunications, sensory and other technological aids and devices;
11. recruitment and training services to provide new employment opportunities in the fields of rehabilitation, health, welfare, public safety, law enforcement and other appropriate public services employment;
12. placement in suitable employment;
13. post-employment services necessary to maintain or regain other suitable employment;
14. occupational licenses, tools, equipment, initial stocks and supplies;
15. rehabilitation engineering services; and
16. other goods and services that can reasonably be expected to benefit an individual with handicaps in terms of employability.

Attachment 6.1(a)15A describes how rehabilitation engineering services will be provided to assist an increasing number of individuals with handicaps (Sec. 101(a)(5)(C)).

b. Designated State Unit's Written Policies on Scope and Nature of Services (34 CFR 361.42(b))

The State unit has established and maintains written policies covering the scope and nature of each vocational rehabilitation service specified in Section 6.1(a), and the conditions, criteria, and procedures under which each service is to be provided.

6.2 Vocational Rehabilitation Services to Groups of Individuals with Handicaps

a. Management Services and Supervision of Small Business Enterprises (Sec. 103(b)(1) and 34 CFR 361.1 and 34 CFR 361.50)

The designated State unit provides for:

1. The establishment, management services and supervision of small business enterprises, including the Randolph-Sheppard Vending Facility Program.

   _____ Yes The State unit has established in writing and maintains the descriptions and assurances required in 34 CFR 361.50(b).

   __X__ No

2. The establishment, management services and supervision of only the Randolph-Sheppard Vending Facility Program.

   _____ Yes The State unit has established in writing and maintains the descriptions and assurances required in 34 CFR 361.50(b).

   __X__ No

3. The establishment, management services and supervision of small business enterprises other than the Randolph-Sheppard Vending Facility Program.

   _____ Yes The State unit has established in writing and maintains the descriptions and assurances required in 34 CFR 361.50(b).

   __X__ No

4. The State unit elects to set aside funds from the proceeds of the operation of business enterprises other than thhe Randolph-Sheppard vending facility program.

_____ Yes The State unit maintains a description of the methods used in setting aside funds, and the purpose for which funds are set aside. Such purposes conform with 34 CFR 361.50(c).

__X__ No

b. Telecommunications Systems (Sec. 103(b)(3) and 34 CFR 361.54)

The designated State unit provides for the use of existing telecommunications systems that have the potential for substantially improving vocational rehabilitation service delivery methods, and developing appropriate programming to meet the particular needs of individuals with handicaps. __X__ Yes ____ No. If answered in the affirmative, the State unit has established and maintains written policies covering their use.

c. Special Materials (Sec. 103(b)(4) and 34 CFR 361.55)

The designated State unit provides for the use of special services available to provide recorded material for blind individuals, captioned television, films or video cassettes for deaf individuals, tactile materials for deaf-blind individuals and other special materials providing tactile, vibratory, auditory, and visual readout. __X__Yes ______ No. If answered in the affirmative, written policies have been established and are maintained covering this provision and include the availability of special communication services in the native language of individuals with handicaps from ethnic groups that represent substantial segments of the State's population.

d. Services to American Indians who are Handicapped (Secs. 101(a)(20) and 34 CFR 361.38)

The designated State unit provides vocational rehabilitation services to American Indians with handicaps residing in the State to the same extent that these services are provided to other significant groups of persons with handicaps in the State. Also, the State unit provides vocational rehabilitation services, including, as appropriate, services traditionally used by Indian tribes, to American Indians with handicaps on reservations eligible for services by a special tribal program under Section 130 of the Act.

e. Utilization of Rehabilitation Facilities (Secs. 101(a)(5)(A),(a)(12) and (a)(15), 34 CFR 361.21, and 34 CFR 361.22)

The designated State unit utilizes existing rehabilitation facilities to the maximum extent feasible to provide vocational rehabilitation services to individuals with handicaps in accordance with the provisions of 34 CFR 361.21. In addition, the State unit enters, as appropriate, into agreements with the operators of rehabilitation facilities for the provision of vocational rehabilitation services.

Based upon the findings of the continuing Statewide studies and the annual evaluation of the State's program as required in 34 CFR 361.17, Attachment 6.2(e)A describes the methods used to ensure the appropriate use of existing rehabilitation facilities, including a description of the condition and capacity of these facilities and the need for new, improved or expanded facilities.

f. Construction of Rehabilitation Facilities (Secs. 7(1), (10) and (13), 101(a)(17) and 103(b)(2); and 34 CFR 361.1(c), 34 CFR 361.21, 34 CFR 361.52 and 34 CFR 76.600)

The designated State unit provides for the construction of public or other non-profit rehabilitation facilities. __X__ Yes _____ No. If answered in the affirmative, the designated State unit carries out the activity in accordance with the provisions set forth in 34 CFR 361.21 and 361.52.

g. Establishment of Rehabilitation Facilities (Secs. 7(4), 7(10), 7(13), and 103(b)(2) and 34 CFR 361.1(c), 34 CFR 361.21, 34 CFR 361.51 and 34 CFR 76.600)

The designated State unit provides for establishment of public or other nonprofit rehabilitation facilities. __X__ Yes ______ No. If answered in the affirmative, the designated State unit carries out this activity in conformity with the provisions of 34 CFR 361.21 and 361.51.

h. Facilities and Services for Groups of Individuals with Handicaps (Sec. 103(b)(2) and 34 CFR 361.1 and 34 CFR 361.53)

The designated State unit provides for facilities and services, including services provided at rehabilitation facilities, that may be expected to contribute substantially to the vocational rehabilitation of a group of individuals with handicaps, but that are not related directly to the individualized written rehabilitation program of any one individual with handicaps. __X__ Yes _____ No. If answered in the affirmative the State unit has established and maintains written policies covering their provision.

6.3 Comparable Services and Benefits

a. Vocational Rehabilitation Services for Which Determination of Comparable Services and Benefits is Required (Sec. 101(a)(8) and 34 CFR 361.47(b)(1), (2), and (4))

The designated State unit determines prior to the provision of vocational rehabilitation services, other than evaluation of rehabilitation potential; counseling, guidance, and referral; vocational and other training services, including personal and vocational adjustment training, books, tools, and other training materials not provided in institutions of higher education; placement; rehabilitation engineering services; and post-employment services consisting of the above identified vocational rehabilitation services, to an individual with handicaps, or to members of that individual's family, whether comparable services and benefits are available under any other program to meet the costs of the vocational rehabilitation services.

b. Exception to Comparable Services and Benefits Requirements (Sec. 101(a)(8) and 34 CFR 361.1(c)(2) and 34 CFR 361.47(b)(3))

The requirements of Section 6.3(a) of the State plan do not apply if the determination of the availability of comparable services and benefits under any other program would delay the provision of vocational rehabilitation services to any individual with handicaps who is at "extreme medical risk" as defined in 34 CFR 361.1(c)(2). The determination of extreme medical risk shall be based upon medical evidence provided by an appropriate licensed medical professional.

c. Maximum Utilization of Community Resources (Sec. 101(a)(12) and 34 CFR 361.56)

In the provision of vocational rehabilitation services, the designated State unit makes maximum utilization of public or other vocational or technical training facilities or other appropriate community resources.

6.4 Utilization of Profitmaking Organizations (Sec. 101(a)(21) and 34 CFR 361.57)

The designated State unit has the authority to enter into contracts with profitmaking organizations for the purpose of providing on-the-job training and related programs for individuals with handicaps in accordance with 34 CFR 361.57 when the State unit has determined the profitmaking organizations are better qualified to provide needed services than non-profit agencies, organizations, or facilities in the State.

6.5 Establishment and Maintenance of Information and Referral Resources (Sec. 101(a)(22) and 34 CFR 361.20)

a. General Provisions

The designated State unit has established and maintains programs of information and referral adequate to ensure that individuals with handicaps within the State are given accurate information about State vocational rehabilitation services and independent living services, vocational rehabilitation services available from other agencies, organizations, and rehabilitation facilities, and, to the extent possible, other Federal and State services and programs that assist individuals with handicaps, including client assistance programs.

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The designated State unit refers individuals with handicaps to other appropriate Federal and State programs which might be of benefit to them, and also utilizes existing information and referral systems in the State to the greatest extent possible.

b. Special Information and Referral Resources

To the greatest extent possible, information and referral services will utilize interpreters for the deaf, existing telecommunication systems, specialized media systems for handicapped persons and special materials for blind individuals, deaf individuals, and deaf-blind individuals, as needed.

6.6 Financial Need (34 CFR 361.47(a))

a. Designated State Unit Policy

The following reflects designated State unit policy on economic needs (check appropriate item):

___ Vocational rehabilitation services are provided without reference to the financial need of the individual with handicaps.

___ The financial need of the individual with handicaps is considered in determining the individual's participation in the costs of ALL vocational rehabilitation services other than: evaluation of rehabilitation potential, except for those vocational rehabilitation services other than of a diagnostic nature which are provided under an extended evaluation of rehabilitation potential; counseling, guidance, referral services; and placement. The designated State unit has established in writing and maintains policies covering the determination of economic need.

_x_ The financial need of the individual with handicaps is considered in determining the individual's participation in the costs of certain vocational rehabilitation services other than: evaluation of rehabilitation potential, except for those vocational rehabilitation services other than of a diagnostic nature which are provided under an extended evaluation of rehabilitation potential; counseling, guidance and referral services; and placement.

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Attachment 6.6(a)A identifies those services for which there is an economic needs test. The designated State unit has established in writing and maintains policies covering the determination of economic need.

b. Equitable Treatment

Designated State unit policies on financial need are applied uniformly so that equitable treatment is accorded all individuals with handicaps in similar circumstances.

Section 7: Eligibility for Vocational Rehabilitation Services (Secs. 7(8)(A), 12(c), 101(a)(6) and 101(a)(14))

7.1 Basic Conditions (34 CFR 361.31(b))

Eligibility for vocational rehabilitation services is based only upon the following criteria:

a. The presence of a physical or mental disability which for the individual constitutes or results in a substantial handicap to employment; and

b. A reasonable expectation that vocational rehabilitation services may benefit the individual in terms of employability.

7.2 General Provisions (34 CFR 361.31(a) and 34 CFR 76.500)

a. Eligibility requirements are applied by the designated State unit without regard to sex, race, age, creed, color, or national origin.

b. No group of individuals or individual is excluded or found ineligible solely on the basis of the type of disability.

c. No upper or lower age limit is established that will, in and of itself, result in a finding of ineligibility for any individual who otherwise meets the basic eligibility requirements identified in Section 7.1 of this State plan.

d. No residency requirement, durational or other, is imposed that excludes from services any person who is present in the State.

7.3 Interim Determination of Eligibility (34 CFR 361.31(c))

The designated State unit provides for the initiation of vocational rehabilitation services for an individual on the basis of an interim determination of eligibility.
_x_ Yes _____ No.

If the designated State unit provides for an interim determination of eligibility, it has established criteria for making such a determination, the procedure to be followed, the services which may be provided, and the period, not to exceed 90 days, during which services may be provided until a final determination of eligibility is made.

7.4 Evaluation of Vocational Rehabilitation Potential: Preliminary Diagnostic Study

(Secs. 7(5) and 103(a)(1), and 34 CFR 361.32)

a. Basic Conditions

In order to determine whether any individual is eligible for vocational rehabilitation services, there is a preliminary diagnostic study to determine if the individual meets the eligibility requirements identified in Section 7.1 of this State plan, or requires an extended evaluation of rehabilitation potential to make a determination regarding eligibility.

b. Scope of Preliminary Diagnostic Study

The preliminary diagnostic study includes examinations and diagnostic studies to make the determinations identified under Basic Conditions, and in all instances, the evaluations place primary emphasis on determining the individual's potential to achieve a vocational goal.

c. Specific Evaluation

The preliminary diagnostic study includes an appraisal of the current health status of the individual based, to the maximum extent possible, on available medical information, and, as appropriate, evaluations by qualified personnel of the potential to benefit from rehabilitatin engineering services. Also, in all cases of mental or emotional disorder, an examination is provided by a physician skilled in diagnosis and treatment of such disorders, or by a psychologist licensed or certified in accordance with State laws and regulations, in those States where such laws and regulations pertaining to the practice of psychology have been established.

7.5 Evaluation of Vocational Rehabilitation Potential: Thorough Diagnostic Study (Section 7(5) and 34 CFR 361.33)

a. General Provisions

As appropriate, in each case, when an individual has been determined eligible for vocational rehabilitation services, there is a thorough diagnostic study to determine the nature and scope of services needed by the individual. This study consists of a comprehensive evaluation of pertinent medical, psychological, vocational, educational, recreational, and other factors relating to the individual's handicap to employment and rehabilitation needs.

b. Scope of Thorough Diagnostic Study

The thorough diagnostic study includes in all cases to the degree needed, an appraisal of the individual's employability, personality, intelligence level, educational achievement, work experience, personal, vocational and social adjustment, employment opportunities, and other pertinent data helpful in determining the nature and scope of needed services. In addition, the study encompasses an appraisal, as appropriate, of the individual's patterns of work behavior, ability to acquire occupational skills, capacity for successful job performance, and the need for rehabilitation engineering services.

7.6 Extended Evaluation of Vocational Rehabilitation Potential (Sec. 7(5) and 34 CFR 361.34)

a. Basic Conditions

The provision of vocational rehabilitation services under an extended evaluation to determine vocational rehabilitation potential is based solely on the presence of a physical or mental disability which for the individual constitutes or results in a substantial handicap to employment, and there is an inability to make a determination that vocational rehabilitation services might benefit the individual in terms of employability, unless there is an extended evaluation to determine vocational rehabilitation potential.

b. Duration and Scope of Services

Vocational rehabilitation services necessary for the determination of rehabilitation potential, including those provided within a thorough diagnostic study, may be provided to an individual for a total period not longer than 18 months and must be provided in accordance with the provisions of 34 CFR 361.34(c).

c. Review

The individual's progress will be thoroughly assessed as frequently as necessary but at least once every 90 days during the extended evaluation period. This assessment must include periodic reports from the facility, or person providing the services to determine the results of the services and to determine if the individual may be determined to be eligible or ineligible.

d. Termination

The extended evaluation of vocational rehabilitation potential must be terminated prior to the expiration of the 18 month limitation when (1) the individual is found eligible for vocational rehabilitation services since there is a reasonable assurance that the individual can be expected to benefit in terms of employability from vocational rehabilitation services; or (2) the individual is found ineligible for any additional vocational rehabilitation services because it has been determined on the basis of clear evidence that the individual cannot be expected to benefit in terms of employability from vocational rehabilitation services. When an individual is determined ineligible, a review of the ineligibility determination in accordance with 34 CFR 361.40(d) is followed and the individual is referred for services under the State's independent living rehabilitation program under 34 CFR Part 365.

7.7 Certification of Eligibility, Extended Evaluation to Determine Vocational Rehabilitation Potential; or Ineligibility (Secs. 12(c), 101(a)(6), and 102(c) and 34 CFR 361.35)

a. Eligibility Certification

Before or at the same time the designated State unit accepts an individual for vocational rehabilitation services there must be a certification, dated and signed by an appropriate State unit staff member, that the individual has met the basic eligibility requirements specified in Section 7.1 of the State plan.

b. Extended Evaluation Certification

Before and as a basis for providing an extended evaluation to determine vocational rehabilitation potential, there must be a certification, dated and signed by an appropriate State unit staff member, that the individual has met the requirements of 34 CFR 361.34(a).

c. Ineligibility Certification

Whenever the State unit determines on the basis of clear evidence that an applicant for or recipient of vocational rehabilitation services is ineligible for services, there is a determination dated and signed by an appropriate designated State unit staff member.

The ineligibility determination indicates the reasons for ineligibility and is made only after full consultation with the individual or, as appropriate, the individual's parent, guardian, or other representative, or after giving clear opportunity for this consultation.

The designated State unit notifies the individual in writing of the action taken and of the individual's rights and the means by which the individual may express and seek remedy for any dissatisfaction, including the procedures for review of a determination by a rehabilitation counselor or coordinator under 34 CFR 361.48.

The designated State unit provides the individual with a detailed explanation of the availability of the resources within a client assistance program established under section 112 of the Act and referral is made to other agencies and facilities, including when appropriate, the State's independent living rehabilitation program under 34 CFR Part 365.

d. Review of Ineligibility Determination

If an applicant for vocational rehabilitation services has been determined on the basis of the preliminary diagnostic study to be ineligible because of a finding that the individual cannot be expected to achieve a vocational goal, the ineligibility determination will be reviewed within 12 months.

This review need not be conducted if the individual has refused it, the individual is no longer present in the State, his or her whereabouts are unknown, or his or her medical condition is rapidly progressive or terminal.

e. Closure Without Eligibility Determination

When an applicant for vocational rehabilitation services is unavailable during an extended period of time to complete an evaluation of vocational rehabilitation potential and the State unit has made repeated efforts to contact the individual to encourage the individual's participation, the individual's case can be closed without any determination of eligibility.

Section 8: Individualized Written Rehabilitation Program

8.1 Procedures (Sec. 101 (a)(9) and 102 and 34 CFR 361.40)

a. General Provisions

An individualized written rehabilitation program is initiated and periodically updated for each eligible individual and for each individual being provided services under an extended evaluation to determine rehabilitation potential. Vocational rehabilitation services are provided in accordance with the individualized written rehabilitation program. The individualized written rehabilitation program is developed jointly by the vocational rehabilitation counselor or coordinator and the individual with handicaps or, as appropriate, that individual and a parent, guardian, or other representative, including other suitable professional and informed advisors.

The designated State unit provides a copy of the individualized written rehabilitation program, and any amendments, to the individual with handicaps, or as appropriate, that individual and a parent, guardian, or other representative.

The designated State unit advises each individual with handicaps or that individual's representative of all State unit procedures and requirements affecting the development and review of individualized written rehabilitation programs.

b. Review

The individualized written rehabilitation program is reviewed as often as necessary but at least on an annual basis. Each individual with handicaps, or, as appropriate, that individual's parent, guardian or other representative, is given an opportunity to review the program and, if necessary, jointly redevelop and agree to its terms.

c. Review of Ineligibility Determination

If services are terminated under an individualized written rehabilitation program because of a determination that the individual with handicaps is not capable of achieving a vocational goal and is therefore no longer eligible, or if in the case of an individual with handicaps who has been provided services under an extended evaluation of vocational rehabilitation potential, services are terminated because of a determination that the individual cannot be determined to be eligible, the following conditions and procedures will be met or carried out:

(1) this decision is made only with the full consultation of the individual, or, as appropriate, the individual's parent, guardian, or other representative, unless the individual has refused to participate, the individual is no longer present in the State or the individual's whereabouts are unknown, or the individual's medical condition is rapidly progressive or terminal. When the full participation of the individual or a representative of the individual has been secured in making the decision, the views of the individual are recorded in the individualized written rehabilitation program;

(2) the rationale for the ineligibility decision is recorded as an amendment to the individualized written rehabilitation program certifying that the provision of vocational rehabilitation services has demonstrated that the individual is not capable of achieving a vocational goal, and a written, dated, and signed determination of ineligibility under 34 CFR 361.35(c) is then executed; and

(3) there will be periodic review, at least annually, of the ineligibility decision in which the individual is given the opportunity for full consultation in the reconsideration of the decision, except in situations where a periodic review would be precluded because the individual has refused services or has refused a periodic review, the individual is no longer present in the State, his or her whereabouts are unknown, or his or her medical condition is rapidly progressive or terminal. The first review of the ineligibility decision is initiated by the' State unit. Any subsequent reviews, however, are undertaken at the request of the individual.

8.2 Content (Secs. 101(a)(9) and (a)(11) and 102 and 34 CFR 361.41)

a. Scope of Content

Each individualized written rehabilitation program is based on a determination of employability designed to achieve the vocational objective of the individual and is developed through assessments of the individual's particular rehabilitation needs.

Each individualized written rehabilitation program includes, as appropriate but not limited to, statements concerning:

(1) The basis on which a determination of eligibility has been made, or the basis on which a determination has been made that an extended evaluation of vocational rehabilitation potential is necessary to make a determination of eligibility;

(2) The long-range and intermediate rehabilitation objectives established for the individual based on an assessment determined through an evaluation of rehabilitation potential;

(3) The specific rehabilitation services to be provided to achieve the established rehabilitation objectives including, if appropriate, rehabilitation engineering services;

(4) An assessment of the expected need for post-employment services;

(5) The projected dates for the initiation of each vocational rehabilitation service, and the anticipated duration of each service;

(6) A procedure and schedule for periodic review and evaluation of progress toward achieving rehabilitation objectives based upon objective criteria, and a record of these reviews and evaluations;

(7) A reassessment, prior to case closure, of the need for post-employment services;

(8) The views of the individual with handicaps or, as appropriate, that individual and a parent, guardian, or other representative, including other suitable professional and informed advisors, concerning the individual's goals and objectives and the vocational rehabilitation services being provided;

(9) The terms and conditions for the provision of vocational rehabilitation services, including responsibilities of the individual with handicaps in implementing the individualized written rehabilitation program, the extent of client participation in the cost of services, if any, and the extent to which comparable services and benefits are available to the individual under any other program;

(10) An assurance that the individual with handicaps has been informed of that individual's rights and the means by which the individual may express and seek remedy for any dissatisfaction, including the opportunity for a review of rehabilitation counselor or coordinator determinations under §361.48;

(11) An assurance that the individual with handicaps has been provided a description of the availability of a client assistance program established under Section 112 of the Act;

(12) The basis on which the individual has been determined to have been rehabilitated under §361.43; and

(13) The plans for the provision of post-employment services after a suitable employment goal has been achieved and the basis on which those plans are developed; and, if appropriate for individuals with severe handicaps, a statement of how these services will be provided or arranged through cooperative agreements with other service providers.

b. Supported Employment Placements

Each individualized written rehabilitation program must also contain, for individuals with severe handicaps for whom a vocational objective of supported employment has been determined to be appropriate--

(1) A description of the time-limited services, not to exceed 18 months in duration, to be provided by the State unit; and

(2) A description of the extended services needed, an identification of the State, Federal, or private programs that will provide the continuing support, and a description of the basis for determining that continuing support is available in accordance with 34 CFR 363.11(e)(2).

c. Coordination with Education Agencies

When services are being provided to an individual with handicaps who is also eligible for services under the Individuals with Disabilities Education Act (formerly the Education for Handicapped Children Act), the individualized written rehabilitation program is prepared in coordination with the appropriate education agency and includes a summary of relevant elements of the individualized education program for that individual.

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Section 9: Specific Methods of Administration

9.1 State Studies and Evaluations

a. Statewide Studies (Secs. 101(a)(5), (15), and (19) and 34 CFR 361.2(b)(1)(ii) 34 CFR 361.17(b), and 34 CFR 363.11(b))

The designated State unit conducts continuing Statewide studies of the needs of individuals with handicaps within the State, including a full needs assessment for serving individuals with severe handicaps; the State's need for rehabilitation facilities; and the methods by which these needs may be most effectively met. The scope of the designated State unit's continuing Statewide studies is consistent with the provisions of 34 CFR 361.17(b).

Attachment 9.1(a)A describes the results of the Statewide assessment of the rehabilitation needs of individuals with severe handicaps residing within the State and the State's response to the assessment.

b. Annual Evaluation 34 CFR 361.17(c))

The designated State unit conducts an annual evaluation of the effectiveness of the State's vocational rehabilitation program in achieving service goals and priorities as established in the plan. Findings derived from the annual evaluation are reflected in the State plan, its amendments, and in the development of plans and policies for the provision of vocational rehabilitation services either directly by the State unit or within rehabilitation facilities.

c. Changes in Policy Resulting from Statewide Studies and Annual Program Evaluation (Sec. 101(a)(19) and 34 CFR 361.2(b)(2)(i) and 34 CFR 361.17)

There have been changes in policy made in the past fiscal year which have resulted from the continuing Statewide studies of the needs of handicapped individuals and from the annual evaluation of the effectiveness of the State's vocational rehabilitation program in achieving program goals and priorities.

____ No

__x__ Yes (Attachment 9.1(c)A describes these changes)

Effective Date:
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9.2 State Plan for Rehabilitation Facilities (Sec. 101(a)(15) and 34 CFR 361.21)

The designated State unit maintains a State rehabilitation facilities plan which includes (1) an inventory of rehabilitation facilities and rehabilitation facility services available within the State; (2) a description of the utilization patterns of the facilities and their utilization potential; (3) a determination of needs for new, expanded or otherwise modified rehabilitation facilities or rehabilitation facility services; and (4) a prioritized list of facility projects necessary to achieve short-range State unit goals.

The inventory of facilities is developed with the active participation of a representative group of providers and recipients of vocational rehabilitation services and is available to the public for review and inspection.

9.3 Order of Selection for Services (Secs. 7(11), 7(15), 101(a)(5)(A), and 101(a)(13)(B), and 34 CFR 361.36 and 34 CFR 361.2(b)(2)(iv) and (v))

a. The designated State unit is providing services to all eligible individuals who apply for vocational rehabilitation services. _x_ Yes ____ No

b. If the designated State unit cannot provide vocational rehabilitation services to all individuals who are eligible for vocational rehabilitation services, Attachment 9.3(b)A shows and justifies the order to be followed in selecting individuals with handicaps to be provided vocational rehabilitation services, and describes the general outcome and service goals to be achieved for individuals with handicaps in each priority category within the order of selection and the time within which those goals will be achieved. In the designated State unit's order of selection, those individuals with the most severe handicaps are selected for service before other individuals with handicaps and special consideration is given to public safety officers whose handicapping conditions meet the provisions of 34 CFR 361.36(c).

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9.4 Methods to Expand and Improve Services to Individuals with the Most Severe Handicaps (Secs. 101(a)(5), (10) and (15) and 34 CFR 361.2(b)(2)(ii) and (iii) and 34 CFR 361.17(b)(2))

Attachment 9.4A describes the methods used to expand and improve services to those individuals who have the most severe handicaps, including individuals served under 34 CFR Part 363 (State Supported Employment Services Program), and also provides estimates of the number of individuals with handicaps who will be served with funds provided under the Act.

9.5 Processing Referrals and Applications (Secs. 101(a)(6), and 34 CFR 361.30)

The designated State unit maintains written standards and procedures to assure expeditious and equitable handling of referrals and applications for services.

9.6 Case Recording (Secs. 101(a)(6) and (9) and 34 CFR 361.39)

The designated State unit maintains for each applicant for, and recipient of, vocational rehabilitation services a case record that includes, to the extent pertinent, the following information:

a. Documentation concerning the preliminary diagnostic study supporting the determination of eligibility, the need for an extended evaluation of vocational rehabilitation potential, and, as appropriate, documentation concerning the thorough diagnostic study supporting the nature and scope of vocational rehabilitation services to be provided.

b. In the case of an individual who has applied for vocational rehabilitation services and has been determined to be ineligible, documentation specifying the reasons for the ineligibility determination, and noting a review of the ineligibility determination carried out no later than 12 months after the determination was made.

c. Documentation supporting any determination that the individual's handicaps are severe.

d. Documentation regarding periodic assessment of the individual during an extended evaluation of vocational rehabilitation potential.

e. An individualized written rehabilitation program as developed under §361.40 and §361.41 and any amendments to the program.

f. In the event that physical and mental restoration services are provided, documentation supporting the determination that the clinical status of the individual with handicaps is stable or slowly progressive unless the individual is being provided an extended evaluation of rehabilitation potential.

g. Documentation supporting any decision to provide services to family members.

h. Documentation relating to the participation by the individual with handicaps in the cost of any vocational rehabilitation services if the State unit elects to condition the provision of services on the financial need of the individual.

i. Documentation relating to the eligibility of the individual for any comparable services and benefits, and the use of these services and benefits.

j. Documentation that the individual has been advised of the confidentiality of all information pertaining to the individual's case and documentation and other material concerning any information released about the individual with handicaps with his or her written consent.

k. Documentation of the reason for closing the case including the individual's employment status and, if determined to be rehabilitated, the basis on which the employment was determined to be suitable.

l. Documentation of any plans to provide post-employment services after the employment objective has been achieved, the basis on which these plans were developed, and a description of the services provided and the outcomes achieved.

m. Documentation concerning any action and decision involving a request by an individual with handicaps for review of rehabilitation counselor or coordinator determinations under §361.48.

n. In the case of an individual who has been provided vocational rehabilitation services under an individualized written rehabilitation program but who has been determined after the initiation of these services to be no longer capable of achieving a vocational goal, documentation of any reviews of this determination in accordance with §361.40(d).

9.7 Periodic Reevaluation of Extended Employment in Rehabilitation Facilities (Sec. 101(a)(16) and 34 CFR 361.58)

The designated State unit periodically reviews and re-evaluates, at least annually, the status of those individuals with handicaps who have been placed by the State unit in extended employment in rehabilitation facilities, to determine the feasibility of their employment or their training for future employment in the competitive labor market, and makes maximum effort to place these individuals in competitive employment or training for competitive employment whenever feasible.

9.8 Individuals Determined to be Rehabilitated (Secs. 12(c), 101(a)(6), 103(a)(2) and 34 CFR 361.43 (a) and (b))

a. Minimum Requirements (34 CFR 361.43(a))

To be determined rehabilitated, an individual with handicaps must have been, as a minimum:

1. determined to be eligible for vocational rehabilitation services;
2. provided an evaluation of vocational rehabilitation potential, and counseling and guidance as essential vocational rehabilitation services;
3. provided appropriate and substantial vocational rehabilitation services in accordance with the individualized written rehabilitation program; and
4. determined to have achieved and maintained a suitable employment goal for at least 60 days.

b. Post-Employment Services (34 CFR 361.43(b))

The designated State unit provides post-employment services if necessary to assist an individual determined to be rehabilitated to maintain or regain other suitable employment.

9.9 Authorization of Services (Secs. 12(c) and 101(a)(6) and 34 CFR 361.44)

The designated State unit provides written authorization, either before or at the same time as the purchase of services. In an emergency situation where a designated State unit employee is permitted to make oral authorization, prompt documentation and written authorization is sent to the service provider.

Section 10: General Methods of Administration

10.1 Methods Necessary for Proper and Efficient Administration (Sec. 101(a)(6) and 34 CFR 361.10)

The State agency and the designated State unit employ those methods of administration as found necessary by the Secretary for proper and efficient administration of the plan and for carrying out functions for which the State is responsible under the State plan.

10.2 Standards for Facilities and Providers of Services (Secs. 12(c) and 101(a)(7) and 34 CFR 361.45)

The designated State unit has adopted and maintains written minimum standards for the various types of facilities and providers of service which it uses in providing vocational rehabilitation services. These standards are readily available to designated State unit personnel and to the public, and the rehabilitation standards meet the provisions of 34 CFR 361.45(b).

10.3 Protection, Use and Release of Personal Information (Secs. 12(c) and 101(a)(6) and 34 CFR 361.49)

The State agency and designated State unit adopts and implements policies and procedures to safeguard the confidentiality of all personal information including photographs and lists of names in conformity with the provisions of 34 CFR 361.49.

10.4 Review of Rehabilitation Counselor or Coordinator Determinations (Sec. 102(d) and 34 CFR 361.48)

a. Informing Affected Individuals

All applicants and clients are informed of the opportunities available for reviews of rehabilitation counselor or coordinator determinations, including the names and addresses of individuals with whom appeals may be filed.

Effective Date:
October 1, 1991

b. Informal Reviews

The designated State unit utilizes an informal administrative review process if it is likely to result in a timely resolution of disagreements in particular instances. x Yes ____ No.

c. Formal Appeals Procedures

The Director of the designated State unit, unless the State has in place a fair hearing board meeting the provisions of 34 CFR 361.48(e), has established formal appeals procedures in accordance with 34 CFR 361.48(c) to enable any applicant for or client of vocational rehabilitation services who is dissatisfied with any determinations made by a rehabilitation counselor or coordinator concerning the furnishing or denial of services to request a timely review of those determinations.

10.5 Reports (Sec. 101(a)(10) and 34 CFR 361.23)

The State agency or the designated State unit, as appropriate, submits reports in the form and detail, and at the time, required by the Secretary, including reports required under special evaluation studies, and will comply with any requirements necessary to assure the correctness and verification of reports.

10.6 Cooperation with Other Public Agencies
(Sec. 101(a)(11) and 34 CFR 361.19)

a. General Provisions

Where appropriate, the designated State unit enters into cooperative arrangements or cooperative agreements with, and utilizes the services and facilities administered by Federal, State and local agencies in accordance with the provisions of 34 CFR 361.19(a).

b. Coordination with Education Programs (Sec. 101(a)(11) and 101(a)(24) and 34 CFR 361.2(b)(2)(vi))

Specific arrangements or agreements are in place for coordinating services for any individual who is eligible for vocational rehabilitation services and is also eligible for services under the Individuals with Disabilities Education Act (formerly Part B of the Education for All Handicapped Children Act) or the Carl D. Perkins Vocational and Applied Technology Education Act of 1990 (formerly the Vocational Education Act).

Attachment 10.6(b)A describes the State unit's plans, policies, and methods to be followed to assist in the transition from education to employment related activities, including a summary of the previous year's activities and accomplishments.

c. Coordination with Veterans' Programs

There is maximum coordination and consultation with programs relating to the rehabilitation of veterans who are disabled.

10.7 Shared Funding and Administration of Special Joint Projects Programs (Sec. 101(a)(1)(A) and 34 CFR 361.11)

The State unit, with the concurrence of the State agency, is participating in a special joint project or program approved by the Secretary, that encompasses shared funding and administrative responsibility with another State or with a local agency to provide services to individuals with handicaps in accordance with the procedural requirements of 34 CFR 361.11(a) and the provisions of the written agreement stipulated in 34 CFR 361.11(b). _____ Yes __x__ No

10.8 Cooperative Programs Involving Funds from Other Public Agencies (Sec. 101(a)(1)(A) and 34 CFR 361.13)

Any cooperative program in which the State's share of the cost of providing or administering vocational rehabilitation services is made available in whole or in part by a State or local public agency other than the designated State unit is based on a written agreement meeting the requirements of 34 CFR 361.13(a).

10.9 Nondiscrimination (34 CFR 76.500)

In accordance with 34 CFR 76.500 (EDGAR) no individual will on the basis of race, color, national origin, sex, age, or handicap be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under this plan.

10.10 Rates of Payment (Secs. 12(c) and 101(a)(6) and 34 CFR 361.46)

The designated State unit has established and maintains written policies to govern rates of payment for all purchased vocational rehabilitation services.

TITLE VI, PART C SUPPLEMENT TO THE TITLE I STATE PLAN FOR VOCATIONAL REHABILITATION SERVICES

Section 1: Administration

1.1 Program Administration (Section 634(b)(1) and 34 CFR 363.11(a))

The designated State unit for vocational rehabilitation services identified in Section 3.2(c) of the Title I State plan administers the State supported employment services program authorized under Title VI, Part C of the Act.

1.2 Financial Administration (Section 634(b)(5) and 34 CFR 363.11(e)(5))

The designated State unit will expend no more than five percent of the State's allotment for administrative costs in carrying out its supported employment services program.

1.3 Statewide Assessment of Supported Employment Services Needs (Sec. 634(b)(2)(A) and 34 CFR 363.11(b))

A summary of the results of the supported employment service needs assessment of individuals with severe handicaps, as identified by the needs assessment carried out under Title I of the Act, including an assessment addressing the coordination and use of information within the State relating to Section 618(b)(3) of the Individuals with Disabilities Education Act (formerly the Education of the Handicapped Act), is provided in Attachment 9.1(a)(A) to the Title I State plan.

1.4 Public Participation in Development of Supported Employment State Plan Supplement to Title I State Plan (Secs. 101(a)(23) and 34 CFR 363.11(e)(7))

The designated State unit, after appropriate and sufficient notice, conducts public meetings throughout the State to allow interested groups, organizations and individuals an opportunity to comment on the Title VI, Part C supplement to the Title I State plan, any revisions to the plan supplement and State policies governing the provision of supported employment services. Attachment 2.5A to the Title I State plan provides a summary of the public comments and the State unit's response to those comments.

1.5 Frequency of Submittals (Sec. 634(a) and 34 CFR 76.140, and 76.142)

The supported employment supplement will be submitted every three years, and amended or revised as necessary to reflect any material change in applicable State law, organization, policy, or agency operations.

1.6 Opportunity for Review and Comment Under State Review Process (34 CFR 79.8)

If the State plan supplement or amendment to the State plan supplement is subject to the State intergovernmental review process, such material will be reviewed and commented on in accordance with the provisions of Executive Order 12372. Comments provided by the State review process will be transmitted to the Rehabilitation Services Administration.

1.7 Description of the Quality, Scope and Extent of Supported Employment Services (Sec. 634(b)(2)(B) and 34 CFR 363.11(c))

Attachment 1.7A describes the quality, scope and extent of supported employment services to be provided to individuals with severe handicaps under this program, including the timing of the transition to extended services to be provided by other State agencies and private nonprofit organizations.

1.8 Distribution of Funds (Sec. 634(b)(2)(B) and 34 CFR 363.11(d))

Attachment 1.8A specifies the State's goals and plans with respect to the distribution of funds received under Section 633(a) of the Act and 34 CFR 363.20.

1.9 Utilization of Services of Other Community Resources (Sec. 634(b)(3)(F) and 34 CFR 363.11(e)(6))

The designated State unit makes maximum use of services from public agencies, private nonprofit organizations, and other appropriate resources in the community to carry out its program of supported employment services.

1.10 Evidence of Collaboration (Sec. 634(b)(4) and 34 CFR 363.11(f))

Attachment 1.10A provides evidence of collaboration by and funding from relevant State agencies and private nonprofit organizations to assist in the provision of on-going supported employment services following the termination of time-limited services provided under Title VI, Part C.

1.11 Reports (Secs. 634(b)(6) and 636, and 34 CFR 363.11(g) and 363.52)

The designated State unit submits reports in the form and detail and in accordance with the procedures that the Secretary may require and complies with the requirements of 34 CFR 363.52.

Section 2: Scope of the Supported Employment Services Program (Secs. 634(b)(3)(A) and 635 and 34 CFR 363.4 and 34 CFR 363.11(e)(1))

The designated State unit provides the following authorized services:

a. Evaluation of Rehabilitation Potential for Supported Employment

The designated State unit provides, if necessary, for each individual with severe handicaps who receives services under Title VI, Part C a supplemental evaluation to the evaluation of rehabilitation potential provided under 34 CFR Part 361.

b. Job Development and Placement

The designated State unit provides for the development of and placement in jobs for individuals with severe handicaps.

c. Traditionally Time-Limited Post-Employment Services

The designated State unit provides traditionally time-limited post-employment services consistent with 34 CFR 363.4(c) that are needed to support individuals with severe handicaps in employment.

Section 3: Individualized Written Rehabilitation Program
(Sec. 634(b)(3)(B), (C), (D), and (E) and
34 CFR 363.11(e)(2), (3), and (4))

a. Content

The designated State unit develops an individualized written rehabilitation program as specified in 34 CFR 361.40 and 361.41 outlining the services to be provided to each individual served under the supported employment services program. The individualized written rehabilitation program also describes the extended services needed by the individual, including the identification of the State, Federal, or private programs that will provide the continuing support, and description of the basis for determining that continuing support is available.

b. Coordination

The designated State unit in providing supported employment services to individuals coordinates the provision of such services with the individualized written rehabilitation program for vocational rehabilitation services, the individualized education program mandated by Section 612(4) and 614(5) of the Individuals with Disabilities Education Act (formerly the Education of the Handicapped Act), and the individualized rehabilitation program mandated by Section 123 of the Developmental Disabilities Act of 1984, respectively.

c. Periodic Reviews

The designated State unit conducts periodic reviews of the progress of individuals provided services under the supported employment services program to determine whether services being provided should be continued, modified, or discontinued.

List of Attachments for Title I State Plan and Title VI, Part C Supplement to Title I State Plan.

State plan attachments describe in greater detail certain elements of the assurances provided in the State plan preprint. Some of the attachments are required for all State plans. Other attachments are contingent on the options selected by the State in its preprint assurances. In addition, those attachments requiring annual revision are noted by an asterisk (*).

Attachments Required of All Title I State Plans

Attachment 2.5A:	Summary of the Public Meeting Comments and the Designated State Unit's Response to the Comments
Attachment 3.2A:	Organization and Functions of the Sole State Agency and Designated State Unit
Attachment 6.1(a)(15)A:	Description of How Rehabilitation Engineering Services Will be Provided to Assist an Increasing Number of Individuals with Handicaps
Attachment 6.2(e)A:	Utilization of Rehabilitation Facilities
Attachment 9.1(a)A:	Summary of the Results of the Comprehensive, Statewide Assessment of the Rehabilitation Needs of Individuals with Severe Handicaps Residing Within the State and the State's Response to the Assessment
* Attachment 9.1(c)A:	Changes in Policy Resulting from Statewide Studies and Annual Program Evaluation
* Attachment 9.4A:	Methods to Expand and Improve Services to Individuals with the Most Severe Handicaps
* Attachment 10.6(b)A:	Designated State Unit's Plans, Policies and Methods Relating to Transitioning

Attachments Required of All Title VI, Part C Supplements to Title I State Plans

* Attachment 1.7A:	Description of Quality, Scope and Extent of Supported Employment Services
* Attachment 1.8A:	State's Goals and Plans Regarding Distribution of Funds Received Under Title VI, Part C
Attachment 1.10A:	Demonstration of Evidence of Collaboration By and Funding From Relevant State Agencies and Private Nonprofit Organizations for Ongoing Supported Employment Services

State Plan Attachments to Title I State Plan Submitted Because of Options Selected by Designated State Unit

Attachment 2.1A:	Statement of Concurrence of the State Developmental Disabilities and Advisory Council and the State Agency(ies) Which Administer the Developmental Disabilities Program
Attachment 3.4(b)A:	Identification of the types of Activities to be Carried Out Under Waiver of Statewideness
Attachment 6.6(a)A:	Identification of Services for Which There is an Economic Needs Test
* Attachment 9.3(b)A:	Description of the Order of Selection, Its Justification and the Outcome and Service Goals within Each Category of the Order (If there are no changes in the State's Order of Selection procedures, only annual revision is required for the Outcome and Service Goals)

Appendix B

Attachments for Title I and Title VI

ATTACHMENT 2.5A: SUMMARY OF PUBLIC COMMENTS AND THE DESIGNATED STATE UNIT'S RESPONSE TO THE COMMENTS

The Office of Vocational and Educational Services for Individuals with Disabilities (VESID) held five open, public meetings during the week of May 6-9, 1991, throughout New York State to provide an opportunity for the public to provide oral comments on the Draft of the New York State Plan for Vocational Rehabilitation and Supported Employment for Federal Fiscal Years 1992, 1993, and 1994. Legal notices regarding the public meetings were published in 10 newspapers throughout the State, including El Diario (in Spanish), on April 2, 1991, more than 30 days prior to the first meeting.

On April 16, notices announcing the public meetings were sent to 1,000 individuals, representing District Superintendents, Directors of Special Education, Independent Living Centers, the Vocational Rehabilitation Advisory Council, VESID District Offices and rehabilitation facilities. The Draft Plan was also mailed to over 1,000 constituents and advocacy groups.

Comments on the Draft State Plan were received from 24 individuals representing various rehabilitation agencies, advocacy groups, and advisory groups. These comments are presented here in two categories. The first category includes those comments which are either in agreement with the Draft Plan or stated in such a way that no action or response to the comment is required. The second category includes those comments which either required a modification of the Draft Plan or a response to explain why modifications could not be made.

Comments Requiring No Modification or Explanation

The following is a summary of general comments received on the State Plan which do not require action or explanation:

- "Overall, we are in agreement with the six (6) priorities of the Plan. We feel it is very important for the State to improve access for individuals with disabilities to the services and programs of the State Education Department provided to the public at large...We feel it is extremely important to insure coordination of services for individuals with disabilities with other New York State agencies. We feel this is especially important for individuals who have mental health disabilities." (Orleans Association for Retarded Citizens)
- "This Plan is the clearest and best evidence of the major progress and positive redirection taking place within VESID

in the year and a half since its reorganization began. We wish to commend VESID on the positive strides evident in the Plan, not only in its layout and communication, but most importantly in its content. We are particularly supportive of (I) the attention being focused on the areas of equalizing and enhancing access to services; (II) seeking new and better models of transition from school to work; and (III) enhancing linkage(s) with other state service systems. Each of these are goals with which we fully concur, and on which we offer comments and recommendations...However, we must also express our dismay at the Plan's total disregard for the sheltered work component of [the] VESID system." (Interagency Council of Mental Retardation and Developmental Disabilities Agency, Inc.)

- "The Office of Vocational and Educational Services for Individuals with Disabilities deserves recognition for taking the lead in developing a comprehensive State Plan for vocational rehabilitation and supported work. There may be problems, controversies, and always room for improvement, but we must appreciate that this Plan will attempt to address key issues affecting persons with developmental disabilities. This Plan will provide needed services to hundreds of individuals with disabilities in both the work place and the community who would otherwise be employed in segregated low paying jobs or would be unemployed and dependent on their families, and/or the government for total financial support." (Queens Independent Living Center)

- "Overall, I was very pleased with the Plan and feel it is an effective document...Priority #3 for integrated employment, supported employment appropriately recognizes the need to expand services to persons with traumatic brain injury." (New York State Head Injury Association)

- "Many of the goals stated in VESID's plans are commendable, such as the commitment to integrated employment opportunities wherever appropriate. Others, such as the absence of program planning for sheltered employment, are cause for concern." (New York State Association of Rehabilitation Facilities)

- "This is to advise you that the International Center for the Disabled supports the State Plan...and particularly commends VESID for its outstanding work in speeding access to services for disabled people. We look forward to working with VESID in implementing the State Plan." (International Center for the Disabled)

- "There are many aspects of this Plan which are very positive and encouraging. We commend you for your efforts to address such critical elements of service provision as: interagency collaboration; a person-centered philosophy; the involvement of the individual and family as active participants; streamlined access to services; the removal of disincentives to integrated employment; increasing involvement with business, industry, and labor; school to work transition; and a renewed focus on people with severe disabilities." (Syracuse University, Division of Special Education and Rehabilitation)

- "...VESID's recently announced first joint effort to provide supported employment in cooperation with the Office of Mental Health is commendable, and we are awaiting demonstrated progress in this area." (New York State Association of Rehabilitation Facilities)

- "We applaud VESID's new philosophy and we recognize the hard work that has gone into preparing this master plan." (Alliance for the Mentally Ill of New York State)

- "Overall, this document is comprehensive in nature and when implemented will improve the delivery of services for people with disabilities in New York State." (Federation of the Handicapped)

- "NYALD strongly supports VESID's mission to provide a continuum of employment opportunities to all persons whose disabilities impose barriers to their employment, and to further address the needs of those individuals currently unserved or underserved. We also support VESID's mission to coordinate the life-long educational services necessary to enable individuals with disabilities to live as independently as possible...NYALD further endorses VESID's philosophy in providing services with dignity and respect for consumers and their families, and for affording consumer driven participation in establishing immediate and long-range educational and vocational goals. We encourage VESID to expand opportunities for consumer participation and to allow for consumer review of the current mechanisms by which the State's vocational services system operates...NYALD supports the coordination of efforts between VESID and OSES to review supported employment services for students with disabilities through New York State. We encourage both agencies to move forward in these efforts, and to include private and public programs for students with disabilities in this review. We further support VESID's plans to review State and Federal laws for children with disabilities in determining impediments to supported employment as an educational training option supported by education funds." (New York Association for the Learning Disabled)

Comments Requiring Modifications or Explanation

The following section summarizes specific comments received during the public comment process and the Department's response to each comment.

COMMENTS	SED RESPONSE
New York State Office of the Advocate for the Disabled:	
1. "...explain (in Plan) that assistive technology is a service which can be provided in all phases of the rehabilitation process including the evaluation and eligibility determination phase..."	1. VESID agrees and has included this information in Attachment 6.1(a)(15)A, A Description of How Rehabilitation Engineering Services Will Be Provided to Assist an Increasing Number of Individuals with Handicaps.
2. "Some persons who may have previously been determined ineligible may now reapply since the provision of assistive technology may make the difference in their eligibility decision...How will the agency use the post-closure client survey or other means to alert persons of these service changes and their ability to request reconsideration?"	2. VESID agrees that consumers will need to be able to access services if changes in technology cause previously ineligible persons to become potentially eligible. In response to the comment from the Office of the Advocate for the Disabled, VESID will publicize the availability of technological aids and devices in public information brochures and in outreach activities with referral sources, advocacy groups, and others. If an individual then feels that new information regarding assistive technology would change his or her eligibility determination, such individuals would be able to reapply for services.

New York State Association of Rehabilitation Facilities:

3.	"VESID should regularly provide statistics on current service levels to enable providers of rehabilitation services to fairly evaluate their accomplishments."	3.	VESID agrees on the importance of providing current statistical data on current services levels. To meet this need, VESID will be disseminating an Annual Report to providers, facilities, advocacy groups, and constituents. This report will reflect general statistical information on individuals served by VESID. The Department has also begun to develop more specific statistics on current service levels. In response to NYSARF's comments, VESID will explore ways to share such information to enable providers to evaluate their accomplishments.
4.	"VESID is not responsible for most extended services, but the viability of extended services is crucial to VESID's mission. A statewide plan for extended services for supported employment must be coordinated among statewide agencies."	4.	VESID agrees that extended services are crucial. State agencies, through the State Interagency Council on Vocational Rehabilitation, are developing agreements on the provision of extended services for individuals in supported employment to ensure that such individuals are provided appropriate extended services. VESID is taking an active role in these discussions.
5.	"...the only plans for rehabilitation facilities and sheltered employment programs call for extensive new monitoring	5.	Based upon the directions established by the State Interagency Council and the agreements established with other State agencies, VESID

	efforts, and therefore does not address the needs of more than twenty thousand people in sheltered employment..."		is responsible for the monitoring of individuals in sheltered employment programs, while OMRDD is responsible for the administration and development of sheltered employment in New York State. This information is described in detail under Priority 2, "Ensure Coordination of Services for Individuals with Disabilities with Other New York State Agencies." However, while the primary responsibilities for sheltered employment program planning has been transferred to another State agency, VESID continues to work closely with OMRDD on issues related to sheltered employment.
6.	"NYSARF believes that the community is in dire need of empirical information on the supported employment program. The State Plan should provide basic data from which to evaluate the appropriateness of the goals."	6.	VESID acknowledges the need for empirical data on the Supported Employment program. The Department, through the Supported Employment Management Information System (SEMIS), has been collecting data on individuals with disabilities in supported employment programs for the past three years. However, the data collected through the SEMIS project will not be available until the fall of 1991. Such data can then be incorporated in future updates of the State Plan. (It should be noted that SEMIS will be replaced by the Supported Employment Interagency Reporting and Monitoring System which will integrate data from OMRDD, CBVH, and VESID.)

7.	"...the State Plan should address in greater detail the needs of the very large population of individuals with mental illness."	7.	The State Plan for Vocational Rehabilitation and Supported Employment for 1992, 1993, and 1994, in Attachment 9.4A, "Methods to Expand and Improve Services to Individuals with the Most Severe Handicaps," addresses in detail the activities related to meeting the special needs of individuals with mental illness. VESID feels that this section appropriately recognizes the importance of addressing the needs of individuals with mental illness.
8.	"VESID assures that it utilizes existing rehabilitation facilities to the maximum extent feasible. Reports from the field suggest that ...referrals are down dramatically in some areas and that length of sponsorship was reduced significantly."	8.	Currently, VESID is closely monitoring the rate of referrals to existing rehabilitation facilities. When specific areas and/or programs are identified as being significantly under-utilized, an analysis will be done to establish the cause of such underutilization. Efforts will be made to enhance utilization of programs that meet the evaluation, training, and placement needs for VESID consumers.
9.	"VESID assures that it provides for the initiation of vocational rehabilitation services for an individual on the basis of an interim determination of eligibility. Reports from the field suggest that interim eligibility is rarely utilized."	9.	VESID recognizes that interim eligibility has been used somewhat infrequently. In response to this concern, changes in procedures to improve access to services have emphasized that interim eligibility determinations should be utilized whenever appropriate. It is anticipated that this change, which is described

			in the Plan, will result in greater use of the interim eligibility option.
10.	"VESID assures that it has established and maintains written standards and procedures to assure expeditious and equitable handling of referrals and applications for services. The VESID process is not frequently described as 'expeditious and equitable' by providers and consumers. We note that VESID is taking many steps to address access problems, but again we have no baseline data from which to evaluate progress."	10.	VESID agrees that baseline data is critical in assessing the impact of changes to address access problems. To address this issue, VESID has designed an evaluation plan to measure the impact of the recent changes in terms of access to services. Data on length of time in status, referral sources, eligibility determinations, and outcomes of services will be compared for persons who applied for services before and after the policy changes were implemented. Attachment 9.1(c)A, "Changes in Policy Resulting from Statewide Studies and Annual Program Evaluation," provides information about baseline data currently available.
11.	"VESID assures that it 'expend(s) no more than five percent of the State's allotment for administrative costs in carrying out its supported employment services program....' Specifically what percentage of its funding does VESID actually expend on the administration of its supported employment program, ...it would seem that it must be more than five percent...."	11.	In Title VI, Part C, Section 1.2 (page 36 of the Assurances), VESID assures that it expends no more than five percent of the State's allotment for administrative costs in carrying out its Title VI, Part C Supported Employment Services. VESID currently funds a high percentage of the administration of supported employment through a Federal grant. As VESID integrates this program option into the full array of services, much of the administration will be absorbed among the duties of staff through

			VESID. This integration will result in a more efficient use of current and planned resources in the administration of supported employment programs.
12.	"It is not explained how supported employment programs are supposed to operate on only 5% administrative costs, an unrealistic figure for any organization."	12.	While VESID recognizes the difficulties inherent in administering programs with limited resources, the current fiscal situation does not provide for additional resources.
	New York State Head Injury Association:		
13.	"I am very much interested (in) ...fostering independent living services for individuals with disabilities in communities and in State Assurance #9.8, 'Shared Funding and Administration of Special Joint Projects or Programs,' (section 101(a)(1)(A) and 34 CFR 36.11). Perhaps this priority can be incorporated into this funding. For example we would like to see blended funding and interagency cooperation in transitioning survivors of head injury to apartments or cooperative living arrangements of their own. We would like to see DSS, DOH, VESID and the Independent Living Centers work together to provide the physical facility and the skills, supports and supervision needed...."	13.	VESID does not participate in special joint programs or projects as described in Title I, Section 10.7 of the Assurances (p. 35). However, VESID does coordinate funding and resources for specific projects and programs with other State agencies related to individuals with traumatic brain injury. Although this is not a joint funding activity, VESID is currently working with the Department of Social Services (DSS) and Department of Health (DOH) on reentry programs for individuals with traumatic brain injury.

14.	"VESID could be especially helpful in setting up and funding services for the head injured which would specifically help in gaining employment, such as mobility training/coaching in the use of public transit, filling out applications, going on interviews, etc."	14.	VESID recognizes the importance of setting up and funding services for individuals with head injuries. VESID currently sponsors supported employment programs that serve individuals with traumatic brain injuries through the provision of services such as those mentioned in the comments provided by the New York State Head Injury Association.

Interagency Council of Mental Retardation and Developmental Disabilities Agencies, Inc.:

15.	"Sheltered work is a legitimate and commonly used goal resulting from diagnostic vocational evaluation (DVE).... It has an important place in the spectrum of VESID services, and will continue to play a key role in New York's vocational services system for the foreseeable future. Sheltered work must be re-inserted into the Plan and given its necessary and appropriate due."	15.	VESID acknowledges the importance of sheltered employment and has amended the State Plan to cite this employment option as a separate service offering in the section, "Service Delivery."
16.	"The Plan seems to reinforce a presumption of **ineligibility**, which must be overcome by the consumer proving his/her eligibility; rather, it should be based upon a presumption of **eligibility**, which is presumed until proven otherwise."	16.	The State Plan section, "Eligibility," has been modified to indicate that eligibility for VESID services is based on the Federal criteria set forth in Federal law, regulation and interpretations of mandates. While VESID has significantly changed its procedures to facilitate the determination of

			eligibility wherever possible, current Federal guidelines do not allow for the presumption of eligibility without certain types of documentation.
17.	"The Plan makes no recognition of the continuing problem of disparities and differences among the eligibility determinations of various counselors; the Plan should couple the reversal of the presumption of eligibility with a defined limitation on the counselor's discretion to deny eligibility."	17.	VESID agrees that greater consistency in practices relating to determination of eligibility is needed. To this end, the changes that are described in the State Plan emphasize a consistent application of good practices. VESID counselors will work closely with applicants for services to review their interests and goals, medical documentation and functional and vocational assessment results. In addition, counselors will apply their expertise and training to the individual situation when determining eligibility. This is in keeping with the individual nature of the vocational rehabilitation process. Consistency will be ensured through case reviews, supervision, and training on decision making. These efforts have been highlighted in the State Plan under the Section, "The Vocational Rehabilitation Process."
18.	"Unofficial 'automatic' placement decisions sort certain types of consumers into certain service modalities, most notably the programmatic expectations for those with severe and/or episodic behavior	18.	VESID agrees that it is important to place consumers in the most integrated vocational setting possible. Current guidelines stress that taking into consideration individual consumer interests and needs, every

	management problems. ... we should presume that eligibility is always for the least restrictive vocational setting..."		attempt must be made to select integrated vocational settings as a service or placement option. This is not, however, an eligibility issue.
19.	"The adult service providers, along with the VESID counselors, must be permitted to collaborate on the pre-transition planning for individual children. The vocational training and concomitant supports received in the final years of school should be directly related to job placement and supports expected from the adult agency."	19.	The Department has recently adopted policies on linking services for students. Approved policy 2 states that all necessary steps will be taken to ensure that individuals with appropriate expertise are included in the Committee on Special Education planning process. These participants could include individuals from vocational education facilities, institutions of higher education, business and industry, independent living centers, and others who are not part of the elementary, middle, and secondary educational systems. This is cited in Attachment 10.6(b)A, "Designated State Unit's Plans, Policies and Methods Relating to Transitioning".
20.	"The RFP process for the adult agencies must be specifically related to the known transition need. Sufficient new service capacity must be reserved to those adult agencies which have worked with the CSE in preparing for the transition of specific children."	20.	The Department recognizes the need for preparing students with disabilities and their families for the transition from secondary school programs to adult education programs, postsecondary programs and/or employment. One effort to plan for such students is through the sharing of information on the transition needs of students entering the adult service systems between the

			Office for Special Education Services and VESID. Requests for Proposals (RFPs) will be developed using information collected from these offices and interagency sources.
21.	"The supports of the other adult service agencies must be integrated into the VESID vocational planning process. We recognize that there is no mandate or entitlement for services from the adult agencies such as OMRDD, OMH, CBVH, etc. However, where a consumer is receiving, or about to receive, from those systems supportive service which are key to the consumer's ability to be placed or supported on a job, this should be clearly integrated into the IWRP... supportive services before placement can be considered (and) should be clearly factored into the IWRP."	21.	VESID and other State agencies which participate on the State Interagency Council for Vocational Rehabilitation are working toward an integrated system. Common referral forms, reciprocity of eligibility documentation, the State directory of services and cross agency training initiatives are examples of efforts to establish such an integrated service delivery system.
22.	"The IWRP must be developed in a team approach, with the rehab counselor coordinating the work of the referring provider, the receiving provider, the adult system from whom the supports are needed, and appropriate family representation."	22.	VESID agrees that the importance of involving family members, advocates, staff from referring agencies or other representatives needs to be stressed in all steps of the planning process, with the individual's permission. This point, which has been included in VESID policy on the development of an IWRP, will be reiterated in staff training.

23. "The coordination of multiple interests, facilitation of goal identification, and monitoring of outcomes are management functions which are going undone; the rehab counselors should be elevated to that role as quickly as possible."

23. Under the new VESID policy on IWRP, counselors will play an increasingly active role with the person being served. The counselor will help the consumer access services from other programs, develop and monitor progress towards intermediate objectives, and set and modify long range goals. Reference is included in the State Plan section, "Individualized Written Rehabilitation Plan."

Queens Independent Living Center:

24. "It is crucial that a more statewide partnership among Supported Work Providers and Independent Living Centers be encouraged and developed.... It is a matter of combining and ensuring quality of services and resources that will encourage persons with disabilities to join the workforce and to continue working."

24. VESID agrees with the importance of statewide partnerships among supported employment providers and independent living centers (ILCs). VESID has recently funded ILC/Supported Employment programs as recognition of the relationship between ILCs and supported employment. VESID will encourage involvement of ILCs in supported employment efforts to facilitate a growing partnership. Information regarding this initiative has been included in the State Plan section, "Priority 4: Foster Independent Living Services for Individuals with Disabilities in Communities."

Orleans Association for Retarded Citizens:

25. "We feel it is extremely important to insure

25. As stated in the State Plan, interagency

	coordination of services for individuals with disabilities with other New York State agencies. We feel this is especially important for individuals who have mental health disabilities.....The County Department of Mental Health and the State Regional Office of Mental Health (OMH) have been less than cooperative in working with the ARC to insure that these services are available so, at this time, there are no vocational services available in Orleans County for individuals with a primary disability of mental health."		cooperation is a major priority of VESID. Currently, VESID and OMH are collaborating on five Systems Integration Programs that will serve to identify the manner in which mental health and vocational rehabilitation services can be integrated to better meet the needs of individuals with mental illness. In addition, the agencies are establishing functional criteria to facilitate referrals and interaction between the systems.
26.	"...it is important for VESID to improve their operating procedures so that individuals with disabilities have improved access to vocational rehabilitation services. Many times in the past these services have not been provided in the most expeditious manner. Individuals who have attended our programs have either had to be dismissed or have languished on waiting lists because the 'paperwork' was not processed."	26.	VESID acknowledges that current operating procedures should be reviewed to ensure that services are delivered as efficiently and expeditiously as possible. The State Plan, in Attachment 9.1(c)A, "Changes in Policy Resulting from Statewide Studies and Annual Program Evaluation," references recent VESID efforts to improve operating procedures to improve access to vocational rehabilitation services for individuals with disabilities. These efforts will continue.
	Western New York Employment Consortium:		
27.	"Job coaches need specific training in meeting the	27.	VESID and the State Interagency Council for

	needs of the individuals they are working with - funding?"		Vocational Rehabilitation recognize the importance of having qualified job coaches and have identified a series of recommendations related to the job coach issue. The establishment of standards for job coaches, including necessary training, is one of those recommendations. VESID currently funds two projects to provide such training and cooperates with Cornell University to make training available to job coaches. VESID plans to continue those efforts.
Onondaga Association for Retarded Citizens/Employment Options:			
28.	"Quality Assurance issues should begin to be addressed by Supported Employment providers. These quality assurance system goals may be considered as a basis for self-assessment evaluation procedures."	28.	Guidelines for Supported Employment providers, which will include quality measures, are being developed by VESID. These, coupled with our new quarterly reporting system and a monitoring protocol which is being developed for on-site reviews, will begin to address quality assurance issues. This information has been included in the State Plan section, "Priority 3: Increase Integrated Employment Options for Individuals with Disabilities."

New York State Coalition for Supported Employment:

29. "... VESID's philosophy of service falls short when you state...'employment itself shall be provided in the most integrated community-based setting that is available.' People in many areas of our state could justify sheltered-only services because no other options are available...the wording of this very important statement (should be) changed to read...'employment shall be provided in integrated community businesses as desired by individuals with disabilities.' Thus, integrated work opportunities would need to be developed if they are not already present."	29. The State Plan has been modified in the section, "VESID's Philosophy of Service," to include the statement that "employment shall be provided in the most integrated community based setting that is appropriate to the individual's needs, abilities and preferences..."
30. "...inappropriate vocational evaluations continue to be used to make decisions about a person's ability to work. For people with severe disabilities, standardized tests, artificial work samples, segregated situational assessments, and other traditional methods of evaluation rarely provide valid information upon which to make decisions.... We advocate for evaluations which are field based, or 'functional,' and which assume a person can work."	30. VESID agrees that individuals should be evaluated through methods that best assess their vocational skills using a variety of vocational assessment tools to help determine eligibility and to plan services, depending on an individual's disabilities, interests, and experiences. Real-work assessments are beneficial for many individuals and are referenced in the State Plan section, "Assessment." VESID will continue to work with providers to develop situational assessments.
31. "...' All persons with disabilities are assumed	31. As stated in response to 16, VESID must follow the

	capable of engaging in productive work and should have the opportunity to do so.' This statement is incongruent with the previously mentioned statement about employability. If one believes that all people are assumed capable of productive work, then is an eligibility criteria based on employability necessary?"		Federal criteria for determining eligibility, which state that vocational rehabilitation services must benefit an individual in terms of employability.
32.	"...when discussing transition from school to work, it is imperative that vocational rehabilitation personnel get involved while the student is still in school. Since schools generally have more money than adult services, rehabilitation counselors should be hired by school districts to assist in the vocational education, job training, job placement, and transition of students with disabilities. Unfortunately, without a teaching degree, schools will not hire rehabilitation counselors."	32.	The Department has recently adopted policies on linking services for students with disabilities. Approved policy 2 states that all necessary steps will be taken to ensure that individuals with appropriate expertise are included in the Committee on Special Education planning process. These participants could include individuals from vocational education facilities, institutions of higher education, business and industry, independent living centers, and others who are not part of the elementary, middle, and secondary educational systems. See Attachment 10.6(b)A, " Designated State Unit's Plans, Policies and Methods Relating to Transitioning."
33.	"There should be an independent monitoring mechanism for sheltered workers. We specifically request investigations of wage rates, especially given the potential change in SEP rules. Further, we	33.	VESID is responsible for monitoring workers in long-term sheltered employment, while OMRDD is responsible for administration. VESID has established a monitoring protocol to independently review

	encourage a policy of 'down-sizing' facilities and the promotion of conversion by VESID and OMRDD."		individual workers in long-term sheltered employment. VESID is not responsible for investigation of wage rates; the Department of Labor reviews wages for workers in long-term sheltered employment. The expansion of supported employment programs is a VESID priority; however, VESID recognizes that sheltered employment will continue to be appropriate for some individuals with disabilities.
34.	"Grants continue to be a primary method of funding supported employment services. Established programs with good reputations should be allowed to submit and negotiate budgets which provide a more stable source of money. Single contracts between VESID and OMR should be pursued. Further, flexible funding amounts, and flexibility in the use of money is necessary to individualize services and supports.... We support the development of special projects to serve people with truly severe disabilities."	34.	The Interagency Request for Proposal (RFP) process for supported employment programs is used only for new programs or for program expansion. Existing supported employment programs are not required to submit new proposals. They can and do negotiate their budgets directly with VESID. Providers are not required to have contracts with both VESID and OMRDD for the intensive component of supported employment, since VESID is now responsible for the administration of intensive supported employment programs in the State. VESID recognizes the need for flexible funding amounts and flexibility in the use of such funding to individualize services and supports. In recognition of this need, the RFP for supported employment disseminated in 1990 provided a range of funding for programs and encouraged the submission of innovative programs. This RFP

			also provided special consideration for proposals which expanded programs and services for people with severe disabilities, such as individuals who may be appropriately transitioned from sheltered employment, day training, day treatment and continuing treatment to integrated employment settings and individuals who are designated as dually diagnosed.
35.	"VESID staff need to be better trained in current best practices so that they are not a barrier to integrated employment.... Integrated employment should be the first option rehabilitation counselors provide."	35.	The State Plan has been modified in the section, "VESID's Philosophy of Service," to include the statement that "employment shall be provided in the most integrated community based setting that is appropriate to the individual's needs, abilities and preferences...." This philosophy provides the framework for training efforts aimed at increasing access to VESID services for individuals with disabilities.
36.	"Through your interactions with state business leaders, we encourage a focus on labor unions for job training and employment opportunities, especially those with state construction contracts."	36.	VESID acknowledges the importance of developing partnerships and increased linkages with employment leaders. One major activity recently undertaken by VESID has been the development of an alliance between New York State AFL-CIO and VESID. The State Plan has been modified in the section, "Priority 3: Increase Integrated Employment Options for Individuals with Disabilities," to include information on this initiative.

37.	"There is a need for outreach efforts to parents and family members who may not know about supported employment or how to obtain these services. Also, families are often given insufficient or inaccurate information upon which to base decisions."	37.	VESID recognizes the need for outreach efforts to parents and family members and is working toward increasing the participation of parents and family members in all steps of the IWRP planning process.

Parents for Positive Futures:

38.	"VESID, OMRDD, OMH and CBVH must come up with a system of serving people that does not mean waste of money or duplication of paper work."	38.	VESID and other State agencies, which participate on the State Interagency Council for Vocational Rehabilitation, are working toward an integrated system. Common referral forms, reciprocity of eligibility documentation, the development of a State directory of services and cross-agency training initiatives are examples of efforts to establish an integrated service delivery system for individuals with disabilities in New York State.
39.	"I would ask that you advocate for sufficient funding so that agencies will look at supported work as an option that should be pursued and offered to people without the agency fearing that they will go bankrupt giving the service."	39.	VESID is advocating for additional funding for supported employment through a variety of activities. VESID has provided the Division of Budget with information about the long-term costs and benefits of sustaining supported employment options rather than more costly alternative programs. We are also working with the State Interagency Council on Vocational Rehabilitation to examine the ways in

			which other State agencies can share in the cost of supported employment services and to develop a uniform system of funding which will provide security to providers of such services.
	Advisory Council on Vocational Rehabilitation:		
40.	Since the attachments contain important information, they should be placed at the front of the document.	40.	VESID recognizes the importance of the attachments. However, the description of the vocational rehabilitation process in New York State, VESID priorities, current activities and planned activities for 1992, 1993, and 1994 and the Assurances which describe the required attachments precede the attachments to provide a context for a large population of readers.
41.	In place of the word minority, VESID should use language cited on page 15 of the pre-printed assurances, specifically without regard to race, age, creed, color, or national origin.	41.	The Department will use the language "without regard to gender, race, age, creed, color, or national origin" to replace the word "minority" in the State Plan where appropriate.
42.	The word empowerment should appear throughout the document, since it epitomizes the philosophy of leading full and independent lives.	42.	The Department encourages the active participation of individuals with disabilities and their families in the vocational rehabilitation process. The word "empowerment" does not clearly articulate this process.
43.	VESID should include in its evaluation plans numbers to reflect real progress.	43.	The Department will be disseminating an Annual Report to providers, facilities, advocacy

			groups, and constituents. This report reflects statistical information on individuals served by VESID. The Department has begun to develop and will disseminate statistics on current service levels.
44.	VESID should use the word "appropriate" rather than "available" in its policy when referring to finding employment placements in integrated community settings.	44.	The Department will include in the State Plan the word "appropriate" rather than "available" when referring to finding employment placements in integrated community settings.
45.	The document should indicate how VESID monitors its activities to insure that services are provided to the appropriate persons and that services are provided in the most effective manner.	45.	VESID has the responsibility for the monitoring of individuals in long-term sheltered employment, even though the responsibility for approval of programs and funding rests with OMRDD. As part of VESID's quarterly reporting system, we are able to track which individuals exit long-term sheltered employment and which type of settings they go to after placement in a sheltered workshop. This information has been included in the State Plan section, "Priority 2: Ensure Coordination of Services for Individuals with Disabilities with Other New York State Agencies."
46.	VESID should indicate in the State Plan that strict principles of confidentiality are adhered to in the delivery of services.	46.	VESID agrees and has included confidentiality requirements within the State Plan section, "Intake."

47.	The importance of parents empowering their children and the overall importance of parents playing a key role in the rehabilitation of their children should be emphasized in the document.	47.	VESID encourages families to participate in the vocational rehabilitation process. References in the State Plan regarding the involvement of family members are cited in the section, "The Vocational Rehabilitation Process."
48.	VESID should include reference to the importance of cooperating with Federal agencies.	48.	The State Plan section, "Establishment of VESID Priorities," was modified to include reference to the importance of VESID cooperating with the Federal agencies.
49.	The document should specify what happens, procedurally, when a consumer is found ineligible for services.	49.	The State Plan section, "Eligibility," has been revised to include the legal rights of individuals with disabilities who are found ineligible for VESID services.
50.	"...or moves from one state to another."	50.	Eligibility is not based on length of residence in a state. If a person is eligible for services and employment in a particular state and is available for services and employment in New York State, he/she can apply for services since eligibility is not based on length of residence in a state. The State Plan section, "Eligibility," has been changed to reflect this information.
51.	The Client Assistance Program and the appeal process of parents and consumers should be identified early in the document.	51.	The State Plan section, "Eligibility", states that individuals who disagree with an eligibility determination will be provided information about their right to appeal.

52.	The word underserved needs to be defined. Once defined, VESID should describe what priority activities are planned to reach out to this group.	52.	The term underserved is not defined in Federal or State regulations. However, such groups are identified by their particular service needs or identification by their constituencies. VESID resources and funding are distributed to reflect these populations through RFPs, program initiatives, policies that meet constituent needs and interagency agreements.
53.	The document should more clearly indicate VESID's responsibility to insure that its consumers receive services from other agencies. Sheltered Employment should be specifically identified as a service offering in this regard.	53.	The State Plan has been revised to site sheltered employment as a separate service offering in the section, "Service Delivery."
54.	VESID needs to look at how the State Plan fits into the Commissioner's Compact for Learning and refer to it in the document.	54.	VESID agrees on the importance of the Commissioner's Compact for Learning. The Department has included VESID staff in the review of the Compact for Learning. Reference to the Compact in this document does not, however, fall within the Federal description of activities that should be included in the State Plan.
55.	The Plan should describe how VESID will work with veterans to help make available alternatives in the provision of medical services.	55.	Based upon the Advisory Council's comment, VESID will address this issue with the New York State Division of Veterans' Affairs and the Federal Department of Veterans Affairs.

56.	The role of transition and specific activities related to it need greater emphasis.	56.	VESID recognizes the important role of transition activities. In response to this the Department has recently completed a year-long policy discussion on linking services for students with disabilities as they prepare to transition from secondary school programs to adult services, postsecondary programs, and/or employment. Ten policies related to this period of transition were approved by the Board of Regents at the November 1990 meeting. A description of these policies is available in Attachment 10.6(b)A, "Designated State Unit's Plans, Policies and Methods Relating to Transitioning."
57.	An indication needs to be made that VESID's six priorities are not listed in order of importance.	57.	VESID has included a statement in the State Plan that VESID's priorities are not listed in order of importance.
58.	VESID needs to consider developing a system of determining consumer satisfaction.	58.	VESID is developing a system of determining consumer satisfaction.
59.	Service providers other than Independent Living Centers should be mentioned in terms of transition from school.	59.	Attachment 10.6(b)A, "Designated State Unit's Plans, Policies and Methods Relating to Transitioning," includes reference to individuals from vocational rehabilitation facilities.
60.	The role of the counselor should be independently described and listed in the table of contents.	60.	VESID acknowledges the important role of the counselor which is referred to throughout the section, "The Vocational Rehabili-

			tation Process." To describe the role of the counselor in a separate section would remove the important contributions of the counselor to the overall vocational rehabilitation process.
61.	Rehabilitation facilities should be added as a major referral source.	61.	The State Plan has been modified to include the statement that rehabilitation facilities are a major referral source.
	Alliance for the Mentally Ill of New York State:		
62.	"In respect to eligibility for services, we feel people with mental illnesses should be given broader latitude in opportunity to be served through VESID. Not just those with expectation or a successful placement should be eligible."	62.	VESID and OMH recognize the needs of people with mental illness and are working together to provide integrated mental health and vocational rehabilitation services to meet the needs of such individuals. A major initiative has been the development of pilot Systems Integration Programs which will provide integrated mental health and vocational rehabilitation services to individuals with mental illness at five sites throughout the State. Successful components of these Systems Integration Programs will be implemented statewide to ensure that individuals with mental illness receive appropriate services to meet their needs.
63.	"With respect to integrated services with the Office of Mental Health, we are encouraged by plans to set up pilot projects in supported	63.	VESID is obligated to comply with the current provisions of the Federal Rehabilitation Act; however, VESID and OMH have cooperated in responding to

	employment that are designed to reveal how OMH and VESID can work best together, using their combined expertise. But from what we understand, basic difficulties remain with respect to the roles of the two agencies in serving this population because VESID must abide by Federal Rehabilitation Services Act provisions not acceptable to mental health professionals."		Supported Employment regulations (Federal) that are restrictive toward mental health consumers. VESID views the Systems Integration Programs described in 62 as a means to identify and develop methodologies to gain maximum use from both Federal and State resources. These pilot programs will also enable VESID and OMH to address the appropriate roles and responsibilities of the agencies in meeting the needs of individuals with mental illness. Both agencies are committed to resolving regulatory and programmatic differences and promoting access for mental health consumers.
64.	"Under Federal law VESID requires disabled persons in supported employment to work at least 20 hours a week...this is not practical."	64.	VESID acknowledges this issue and has asked for revision in Federal regulations in addition to addressing this issue in proposed integrated employment legislation.
65.	"VESID's programs are time limited -- beyond about six weeks of intensive supported employment or training the Federal assistance ends and the State must take over follow-up funding. This separation is unrealistic and limits flexibility in dealing with different client characteristics."	65.	VESID has been training staff to expand their concept of intensive services to individuals with mental illness. The VESID/OMH Systems Integration Program pilots should facilitate developing a model of how Federal and State resources may best be used for such individuals. Resources from both sources are necessary, and by facilitating reintervention methodologies, this issue should be addressed.

66.	"Clients with mental illnesses may not want the stigma of a job coach at the job site but VESID persists in having it done their way."	66.	Intervention methodology is established by the service provider. It is the provider's responsibility to ensure that intervention is conducted in the least intrusive and most consumer directed manner possible.
67.	"...we feel VESID's new individual written rehabilitation plans may be somewhat expansive and unrealistic. You don't need a detailed treatment plan for someone at a sheltered workshop, for example, whose career plans may be limited."	67.	An IWRP must be developed, as required by Federal statute and regulation, for all individuals receiving services.
68.	"...need to promote more alternative work program models...how many of these will be VESID-sponsored?"	68.	As described in 62, VESID and OMH are committed to providing integrated vocational rehabilitation and mental health services for individuals with mental illness. The successful components of the Systems Integration Program pilots will provide the basis for implementation statewide of such programs.
69.	"We believe your agency's overall goals for employing mentally ill persons should be...dignified, worthwhile work activity of some type always available to every applicant who believes he or she can benefit... acceptance of that person's right to drop out and re-enter a VESID sponsored or sheltered employment program at any stage and throughout a person's lifetime."	69.	VESID and OMH, as evidenced by the Systems Integration Program pilots, is committed to providing services which provide the flexibility required by individuals with mental illness, including the ability of the individual to reenter vocational rehabilitation programs.

The Federation of the Handicapped:

70.	"...The major activities of the (Interagency) Council appear to focus on the systemic relationships between and among State agencies. The Council may help delineate the responsibilities of the various agencies but this does not necessarily ensure the coordination and comprehensiveness of services on an individual level.... There should be a central point of entry for all services to determine the range of services necessary and to identify appropriate resources and funding streams for those services."	70.	Members of the State Interagency Council on Vocational Rehabilitation agree that the coordination of comprehensive services on an individual level is critical. The State Interagency Council is developing an interagency concept to ensure that individuals with multiple service needs will receive coordinated services. Reciprocity of disability determinations across systems, an inter-agency referral system, and extensive training of the work force are intended to ensure a comprehensive review of each individual's service needs.
71.	"According to the activities planned for 1991-94 as described on page 26 of the State Plan, VESID intends to develop a Statewide Policy on Integrated Employment with Supported Employment playing a major role in the effort to place individuals with severe disabilities in an integrated setting. This would be an ideal opportunity to broaden the scope of supported employment to include modalities that are currently in operation but have not been recognized by VESID as viable supported employment options."	71.	VESID through its Request for Proposal process, which provided funding for new and expanded supported employment programs, provided special consideration to programs that were innovative and addressed the needs of a wide variety of individuals with disabilities. In addition, VESID is developing more flexible service options to address employment integration that goes beyond the traditional supported employment concept.

72.	"...the scope of eligible consumers for supported employment services should also be broadened. For example there are many consumers who can benefit from a structured classroom training setting before placement but who require follow along services once on the job...By providing ongoing support for people who are capable of learning higher level skills but require assistance in maintaining appropriate work behavior, it is possible for people with severe disabilities to enter occupations not previously considered viable."	72.	VESID agrees and has been working with the State Interagency Council on Vocational Rehabilitation to address the scope of integrated employment options, including the issue that supported employment should be available for a broad range of consumers with severe disabilities.
73.	"Another area that should be re-examined by VESID is the policy on upgrading.... The passage of ADA will allow severely disabled people to advance to higher level jobs with increased responsibility.... VESID should ensure that these opportunities are made available to consumers re-entering the VESID system by providing additional skills training and necessary technological equipment."	73.	VESID agrees and, as part of the next steps in improving service delivery, plans to publish a statewide policy on upgrading that will address this issue.
74.	"VESID's goal of improving access to vocational rehabilitation services addresses concerns expressed over the years...not only should consumers receive services in a timely manner but the services available and the	74.	VESID agrees that policies should be flexible enough to address individual needs, while providing uniform and consistent practices across the State. As an example, the policies to improve access to services were developed to

	interpretation of guidelines should be consistent from one local office to another. In this process, however, the differences in individual problems, needs, abilities and inner resources should not be ignored. The development of a Plan and the provision of service must be driven by the requirement of the consumer and not some predetermined timetable."	support consistent counselor judgment from one office to another considering individual needs and circumstances of persons who apply for services. During the next year, VESID will concentrate on developing new policies to improve service delivery and will continue to incorporate this concept.
75.	"Although duplication of procedures and evaluations are time consuming and unnecessarily costly, there are situations where the lack of medical reports can impede a consumers ability to participate in a particular program. For example, medical documentation of a disability is required in order to establish eligibility to work in a JWOD program. Federal regulations demand a medical and/or specialty medical report. However, under VESID's new guidelines, these medical reports are not always available. Instead of improving access, this situation limits the consumers ability to enter this employment option. It is imperative that VESID re-evaluate this new policy to reflect the realities of related programs."	75. VESID still requires medical reports when counselors determine that such documentation is necessary. While we recognize that other programs may require further documentation, VESID should not delay eligibility or vocational rehabilitation services because of these requirements. VESID will work with other programs to resolve any conflicts in required documentation.

New York State Division of Substance Abuse Services

76.	"On page 17, Priority 2, the introductory paragraphs contain no mention of DSAS and the Division of Alcoholism and Alcohol Abuse (DAAA) as key players, albeit not Council members, in the accomplishments of the Interagency Council for Vocational Rehabilitation. Inclusion of this information also would explain the descriptions of interagency activities that follow."	76.	VESID agrees and has modified the State Plan to include the following information on DSAS and DAAA: "In addition to these member agencies, ad hoc participation in the Council is provided by the Division of Alcoholism and Alcohol Abuse and the Division of Substance Abuse Services."
77.	"On page 20, the section regarding DSAS could include the linkages established between treatment programs and Early Childhood Direction Centers, and could describe VESID's role in coordinating the developing relationship with the Office for Special Education Services (OSES)."	77.	VESID agrees and has included the following information in the State Plan, "In addition, VESID has also assisted DSAS in coordinating the developing relationship between DSAS and the Office for Special Education Services."
78.	"The section regarding Activities Planned for 1991-1994 on pages 22-23 should reflect our ongoing commitment to shared endeavors."	78.	VESID agrees that the ongoing commitment to shared endeavors is important; however, this section of the State Plan does not specifically name State agencies. Reference to shared endeavors between VESID, DSAS, and DAAA is made in the section, "Current Activities Related to this Priority."
79.	"In the Current Activities section of Priority 4 (pages 27-28) the efforts	79.	VESID agrees that the State Plan should cite the efforts planned by DSAS and

	to be undertaken to orient staff of independent living programs to substance abuse issues could be noted. Substance abusers might be mentioned in the paragraph on Underserved Populations on the following page (p.29).... Similar mention could be included on page 32 in the paragraph describing Activities Planned for Underserved Populations."		VESID to orient staff of Independent Living Centers to substance abuse issues. Such efforts have been included in the section, "Underserved Populations."
Special Education Parents in Action (SEPIA):			
80.	"Although the Applicant and the Family are stated to be the primary source of information, information available through the referral source and other agencies is also obtained. All information is strictly confidential; no information will be released to or obtained from other parties without the written permission of the Individual with a disability...Does VESID have enough respect for that Individual/Family* (in the event that the individual does not understand*) to obtain a knowledgeable signed release for information from other parties? What does VESID do if the Individual/Family, for whatever reason, maintains a refusal to sign the release? Does VESID have enough respect for the Individual/Family to	80.	VESID agrees that the confidentiality of information is an important component of mutual respect in the counseling relationship. If VESID needs information about, or is asked to share information from another source, the counselor will inform the individual, describe the use of the information, and ask the individual to sign a release for the information. If the individual is unable to understand, the counselor may ask a parent or other responsible party to sign the release. If the counselor and family refuse to authorize the release, no information is shared. VESID has also included in the State Plan a statement about confidentiality on all information and forms shared with others. We will include this information in future training as suggested.

	establish a program that would teach each of the other agencies to grant mutual respect to each Individual/Family (Consumer/Client)? Does VESID's offer to pay for the evaluation affect the Consumer's right to see and receive the original report - or only a copy of the summary, written up by the VESID Counselor?"		VESID will release information directly to a consumer, if the individual requests the information in writing. If medical or psychological information may be harmful to the individual, the counselor may release the information to the parent or other representative.
81.	"Does VESID investigate the Post Secondary Disability Programs, in each situation, to determine that they, appropriately, meet the needs of each Individual Consumer?"	81.	VESID reviews postsecondary programs when approving them as vendors of services. The counselor also works with the individual to select a program that meets his or her specific needs.
82.	"Does VESID collaborate with Post Secondary Job Placement Services to assure appropriateness in placement/follow-up?"	82.	Job placement is the collaborative responsibility of the VESID counselor, the consumer, and the post-secondary program. The VESID counselor follows up with the individual for at least 60 days to ensure that the placement is suitable.
83.	"Why does VESID consider College, as on-the-job training, not in the same category as Rehabilitation Facilities (Contract Agencies), for the purpose of VESID's Economic Needs Test?"	83.	VESID's economic need policy is applied to college training so that VESID's limited resources can be focused first on those individuals with the greatest need. In addition to VESID funding, there are other sources of financial aid available to individuals with disabilities such as the Tuition Assistance Program (TAP) and Pell Grant Program to pay for college costs.

84.	"The Plan concentrates on Sheltered/Supported Employment. Included among the many agencies, coordinated with VESID, are the Department of Civil Service (DCS) and the Department of Health. An example is given of the Department of Civil Services (DCS) which provides 55b and 55c programs in the category of noncompetitive employment. Has VESID considered working with 'COMPETITIVE' employment: (in DCS and in business, in general)?"	84.	The State Plan submission requires the State to commit to implementing Title I of the Rehabilitation Act (which relates to vocational rehabilitation services) and Title VI, Part C (which relates to supported employment programs and services). Therefore, the name of the document must include reference to both titles and several attachments must be developed which relate specifically to the provision of supported employment services provided under Title VI, Part C. VESID is committed to providing integrated employment options for individuals with disabilities and has developed numerous initiatives related to competitive employment through its business and industry initiatives. These initiatives are described throughout the State Plan.
85.	"VESID needs to collaborate between the Department of Health and the Teen Pregnancy Network Agencies to create a program that monitors the Special Education Teen throughout her pregnancy, provides a program that would meet the needs of both Parenting - and - her disability, and evaluates her for her skill which could be trained (possibly, by further education), and turned into a job that she could	85.	The Department has a number of initiatives which focus on the needs of teenagers who are pregnant, including the provision of special education services. Through the Linkages Unit, the Centers Unit and the Intra-Agency Council, VESID works closely with the rest of the Department to coordinate programs and services that have an impact on vocational rehabilitation services and the needs of individuals with disabilities.

	(eventually) use to support the baby, herself. The baby would need to be evaluated, immediately, after birth, to allow him/her to enter into Infant/(Toddler) Stimulation Programs, in order to minimize the effect of the Child's Disabilities, and appropriately respond to the needs of the Child/Teen Parent, as soon as possible."		
86.	"Why does VESID continue to maintain policies that exclude, specifically, as so stated, 'Colleges and Universities,' from services that are provided, without cost, to the Individual/Family?"	86.	VESID must set parameters around services, given the limited resources available to serve persons with disabilities. In this way we can target services toward those most in need because of the severity of their disability or because of limited resources.
Commissioner's Advisory Panel on the Education of Children with Disabilities:			
87.	"The concept of supportive employment of school age handicapped students is a very important one. While it is important to provide the services for severely handicapped individuals, there is also a need for supportive employment for some learning disabled high school students who cannot go on to college but do not have the skills to keep a job."	87.	VESID acknowledges the importance of providing supported employment for students with learning disabilities. In the Request for Proposal (RFP) distributed in April 1990 to expand supported employment programs, special consideration was given to developing supported employment programs for individuals with learning disabilities and for students aging-out of special education programs. VESID will continue to address the needs of such students in future RFPs. In addition,

			VESID will be addressing the State Interagency Council's recommendation that the relationship between special education and supported employment be reviewed.
88.	"The training for VESID counselors on the part 200 system is very important and should also include part 100 as well."	88.	VESID agrees that training should be provided to counselors on the Part 200 system. Such training is described in the State Plan in the section on "Planned Activities for 1992-1994" between VESID and OSES. The training will be expanded to encompass relevant portions of Part 100 regulations which pertain to general education.
89.	"...page 2 - para 1, third sentence - add 'and to coordinate lifelong educational services.'"	89.	This section of the State Plan describes VESID as the designated New York State vocational rehabilitation agency as required by Federal regulations. The statement "and to coordinate lifelong educational services" is, however, included within the mission of VESID since the mission describes the expanded role of VESID in the coordination of services for individuals with disabilities within New York State.
90.	"...page 3 - need to add a focus that include interagency connections, as well as SED services."	90.	The State Plan does reflect, in this section and others, a focus on developing interagency connections.
91.	"...page 4 - last bullet - add intra agency cooperation."	91.	This section refers to other agencies, not the State Education Department. Therefore, the inclusion of

	the term "intra-agency" would not be appropriate.
92. "...page 5 - 2nd para - As defined by Federal legislation - remove 'the disability must seriously impede....' Redundant."	92. The Rehabilitation Act of 1973 requires the language used in this paragraph.
93. "...page 11-12 - Priorities - #2 should include a reference to other community agencies."	93. Priority 2 refers to the coordination of services for individuals with disabilities with other New York State agencies. The coordination of services within community agencies through the VESID Interagency Agreements Unit is described in Attachment 3.2A.
94. "The priorities are not prioritized! I would think increasing community involvement would be first - as well as business/industrial linkages. (as per the New Compact)"	94. The priorities have not been prioritized since each represents a major focus for VESID activities during the next three years. As noted in 57, however, VESID has included a statement in the State Plan that VESID's priorities are not listed in order of importance.

The New York Association for the Learning Disabled:

95. "We **encourage** VESID to implement these priorities in a timely fashion, and to become more visible in attempts to bring in new sources for program development from outside programs and...We **encourage** VESID to further seek expertise outside of the State Education Department system in expanding its base of consumers, professionals and program providers."	95. VESID acknowledges the importance of bringing in new sources for program development. On an ongoing basis, VESID identifies and applies for Federal funding to expand programs and services. VESID has expanded its base of consumers, programs and providers through its inter- and intra-agency initiatives.

96.	"NYALD **endorses** VESID's integrated employment initiatives, including mechanisms whereby individuals may reenter the vocational system as needed to assist them in reaching their maximum career potential. We encourage VESID to further develop mechanisms for the enhancement and monitoring of community integration opportunities."	96.	VESID agrees and, as described in 72, has been working with the State Interagency Council for Vocational Rehabilitation to address the scope of integrated employment options.
97.	"We recommend that VESID coordinate efforts with OMRDD to assure that sheltered workshop programs are designed to appropriately address the needs of those persons progressing toward integrated employment, and to assure that these individuals move into integrated employment settings when appropriate."	97.	As stated in 45, VESID has the responsibility for monitoring of individuals in long-term sheltered employment, even though the responsibility for approval of programs and funding rests with OMRDD. As part of VESID's quarterly reporting system, we are able to track which individuals exit long-term sheltered employment and which type of settings they go to after placement in a sheltered workshop. This information has been included in the State Plan section, "Priority 2: Ensure Coordination of Services for Individuals with Disabilities with Other New York State Agencies."
98.	"While Independent Living Centers clearly address the needs of some individuals with disabilities, they have yet to be a stronghold for persons with Neurological Impairments/Learning Disabilities. NYALD **encourages** ILCs to assess their responsiveness to	98.	The Association for Independent Living Centers of New York has identified the need to assess and serve those groups historically unserved and underserved by independent living centers, including individuals who have diagnoses of neurological and/or learning disabili-

	the needs of more diverse populations, including those of persons with NI/LD."		ties. This also includes Native Americans and individuals with mental illness and mental retardation.
99.	"NYALD **supports** VESID's plans to integrate mental health and vocational rehabilitation services for persons with disabilities. We **encourage** VESID to expand this Plan to address the needs of persons who are dually diagnosed, including those with NI/LD and in need of psychiatric intervention."	99.	VESID acknowledges the need for services for individuals who are dually diagnosed, including those with neurological impairments and learning disabilities and in need of psychiatric intervention. A recent activity undertaken to address this issue has been the special consideration given for the development of supported employment programs for such individuals under the 1990 RFP to expand supported employment programs in the State.
100.	"In furthering its priorities for 1991-1994, we **encourage** VESID to utilize the expertise available through the many programs and organizations providing services to persons with disabilities throughout New York State."	100.	As indicated in 95, VESID has and will continue to use the expertise available through many programs and organizations, including NYALD, in developing programs and services for individuals with disabilities. Recent activities have included the Department's forums to develop policies on linking services for students with disabilities and regional forums to develop priorities for VESID district offices statewide.

ATTACHMENT 3.2A: ORGANIZATION AND FUNCTIONS OF THE SOLE STATE AGENCY AND DESIGNATED STATE UNIT

Organizational Units of the State Agency

Created by the Legislature, The University of the State of New York is governed by the Board of Regents and administered by the State Education Department. It encompasses almost 6,200 public and nonpublic elementary and secondary schools and 41 Boards of Cooperative Educational Services (BOCES); all of the State's 250 higher education institutions, including independent colleges, universities, and degree-granting proprietary schools as well as public institutions of higher education in the City University of New York (CUNY) and the State University of New York (SUNY) systems; more than 7,000 libraries, 77 library systems and the State Library; 1,344 museums, historical societies, and the State Museum; 400 proprietary vocational schools; nursery schools; hospital nursing schools; and nine public television councils.

The University extends beyond traditional educational institutions. The Board of Regents licenses and oversees the activities of 31 professions, and charters colleges, libraries, museums, historical societies, and other cultural agencies. Through the Regents College Degrees and Examinations, the Board grants credit and degrees by examination, while offering no direct instruction. The Board of Regents also recommends college credit for courses offered by business and industry.

The Board of Regents of The University of the State of New York was established in 1784. Its continuance is provided for by the Constitution of the State. The Board of Regents is comprised of 16 unsalaried members; 1 from each of 12 judicial districts of the State and 4 members who serve at large. Its members are elected by the State Legislature for seven-year terms. The Board of Regents is currently organized into six standing committees: Administration, Law, and Legislation; Professional Practice; Cultural Education; Higher and Continuing Education; Elementary, Middle, and Secondary Education; and Services for Individuals with Disabilities.

The State Education Department, under the direction of the Commissioner, carries out legislative mandates and Regents policies. Regulations of the Commissioner of Education, approved by the Regents, establish specific standards for maintaining educational quality and carrying out the mission of the comprehensive educational system which is The University of the State of New York. As the administrative arm of the Regents, the Department plans, funds, monitors, and coordinates educational services provided by agencies such as local school districts, nonpublic schools, colleges and universities. It provides educational services directly to the public, assists educational institutions, and cooperates with other government agencies to advance educational purposes. The Department is responsible for vocational and educational services to individuals with disabilities and coordinating with other agencies and providers to ensure a continuum of services for such individuals. The Department also operates the State Library, the State Museum, and the State Archives. A copy of the organizational chart of the Department is attached.

Relationship Among Organizational Units of the State Agency

The Commissioner of Education, who also serves as the President of The University, is appointed by the Board of Regents. The State Education Department is the administrative arm of the University, and the Commissioner of Education is the Chief Executive Officer of the Department. Under the Commissioner's direction, the Education Department implements Regents policy and administers legislative mandates. The offices of the State Education Department are administered by six Deputy Commissioners who report directly to the Commissioner of Education.

Elementary and Secondary Education: The Office of Elementary and Secondary Education oversees and conducts programs for public and nonpublic schools. The Office also provides assistance to promote equity and excellence in education for all students and to ensure the general effectiveness of the schools. The Office is managed by a Deputy Commissioner and six Assistant Commissioners in the following areas: general and occupational education; planning, testing and technological services; education of children with disabilities; finance and management services; nonpublic school services; and statewide school registration.

School Improvement and Support: The Office of School Improvement and Support manages the Department's programs which provide monitoring and technical assistance to elementary and secondary schools engaged in comprehensive school improvement activities statewide. The Deputy Commissioner supervises four units: school improvement services, parent education, student and child development, and community school programs; school improvement grants management and compliance; and civil rights and intercultural relations. The Office has a primary, but not exclusive, focus upon the schools in New York City.

Cultural Education: The Office of Cultural Education conducts a variety of activities to support the State's total educational program; to preserve the State's natural, historical, and cultural heritage; and to ensure effective management of State and local government records. One of its major responsibilities is to strengthen ties between traditional education programs and the State's museums, libraries, and diverse cultural institutions. In addition to its statewide obligations, the Office operates the State Library, the State Museum, the State Archives and Records Administration, and the Public Broadcasting Program. The Office is headed by a Deputy Commissioner, an Assistant Commissioner for Museum Services, an Assistant Commissioner of State Archives and Records Management, and a Director of the Public Broadcasting Program.

Higher and Continuing Education: The Office of Higher and Continuing Education is responsible for coordinating New York State's extensive system of postsecondary education, including public, independent, and proprietary colleges and universities, nondegree proprietary schools, and a variety of institutions that provide noncredit continuing education. The Office carries out the Regents twin commitments to provide access to some form of higher education or continuing education for all students who seek it and to maintain standards of academic quality. The Office is headed by a Deputy Commissioner who directs activities through five major units, each under an Assistant Commissioner or an Executive Coordinator: postsecondary policy analysis, higher education services, higher education academic review, continuing education, and the teaching profession.

Professions: The primary mission of the Office of the Professions is to contribute to the public welfare through effective administration and regulation of the 31 licensed professions. The Office is headed by a Deputy Commissioner who manages the Office through three major program components: Professional Credentialing, which regulates professional education, examination, and licensure; Professional Responsibility, which deals with the scope and standards of practice, the professional assistance program, and all the disciplinary aspects of professional regulation; and State Boards for the Professions, which advise the Board of Regents and the Department on licensure, scope of practice, and disciplinary matters. The Assistant Commissioners for Professional Credentialing and Professional Responsibility report to the Deputy Commissioner for the Professions. The Executive Secretaries for the State Boards report to the Deputy Commissioner for the Professions through the Executive Coordinator of the State Boards.

The Office reviews and approves academic programs in the licensed professions and related fields; develops, selects, administers, and assesses licensure examinations; regulates professional practice; monitors rehabilitation of impaired practitioners; and investigates and prosecutes unprofessional conduct.

Vocational and Educational Services for Individuals with Disabilities: The Office of Vocational and Educational Services for Individuals with Disabilities (VESID) provides vocational and counseling services to people whose disabilities impose barriers to employment. VESID is also responsible for the overall coordination of educational, vocational, and rehabilitation services to all persons with disabilities, regardless of age, minority status, or disability. The Office leads interagency coordination activities to ensure that services provided by the Education Department for persons with disabilities are coordinated with the work of other New York State agencies. With headquarters in Albany, VESID has 15 district offices throughout New York State that provide assistance to persons with disabilities. The Office is headed by a Deputy Commissioner, an Assistant Commissioner for Service Delivery, and an Assistant Commissioner for Policy and Program Development.

Designated State Unit

The mission of the Office of Vocational and Educational Services for Individuals with Disabilities (VESID) is to:

- provide educational, vocational, and counseling services to people whose disabilities impose barriers to employment.
- increase the access of all people with disabilities, regardless of age, minority status, or disability, to the full range of services that are offered within the State Education Department and other agencies which provide services to such individuals.
- coordinate lifelong educational services to persons with disabilities.

In achieving this mission, VESID will continue to provide services that help persons with disabilities become placed in jobs that meet their individual capabilities and needs. To this end, the central role of the rehabilitation counselor and the vocational rehabilitation process, from referral to placement, will be tailored to provide maximum accessibility to employment in the most efficient manner.

VESID's mission has been extended to include responsibility for the overall coordination of educational, vocational, and rehabilitation services to all persons with disabilities, regardless of age, minority status, or disability. The overall coordination of such services is achieved through interagency and intra-agency coordination activities.

The focus of interagency coordination activities is on ensuring that services provided by the Department for persons with disabilities of any age are coordinated with other New York State agencies so that such services are integrated, nonduplicative, comprehensive, and designed to meet the needs of persons with disabilities in such a manner as to encourage their full and independent participation in society.

VESID's responsibility for coordinating intra-agency activities focuses on assuring access for persons with disabilities to the wide range of services that are available through the State Education Department to all New York State residents.

VESID has two Assistant Commissioners who serve under the Deputy Commissioner for Vocational and Educational Services for Individuals with Disabilities.

Service Delivery: The Assistant Commissioner for Service Delivery is responsible for two primary functions; each function is headed by a Coordinator. The Coordinator of Local Operations is responsible for the various components of the VESID services delivery system, including the district offices. A formalized Local Interagency Coordination Unit is also administered by the Coordinator of Local Operations, the purpose of which will be to assure implementation of statewide interagency agreements through the most efficient and effective interagency approach to the delivery of services to all individuals with disabilities throughout the State.

The Coordinator of Business and Industry Outreach focuses on the development of agreements for major program initiatives with business and industry. The full-time role of this specialized office is to significantly increase the employment alternatives for persons with disabilities in New York State by developing agreements and programs with major corporations as well as small businesses throughout the State, building on significant and highly successful model programs. This office also develops new linkages with Chambers of Commerce, State and local job councils, and other relevant participants.

Policy and Program Development: An Assistant Commissioner for Policy and Program Development is responsible for three major program functions: Policy Development and Coordination; Quality Assurance; and Program Development, Technical Assistance, and Support Services. Each program area is headed by a Coordinator.

The Coordinator of Policy Development and Coordination is responsible for all of the policy development activities within VESID as well as the administration of various State and federally funded programs serving people of all ages with disabilities. A major unit within Policy Development and Coordination is the Interagency Agreements Unit. This unit, on behalf of the Department, is responsible for developing and administering agreements with each of the relevant State agencies regarding the provision of vocational rehabilitation services to persons with disabilities. Another responsibility of this Coordinator is the Policy Development and Evaluation Unit which provides policy manuals and informational materials, and is responsible for the development of legislation and regulations. This unit communicates to the field and internally any changes or revisions in policies, regulations, and legislation. A third unit, Plan and Grant Development, is responsible for all comprehensive State plans for services for individuals with disabilities and the coordination of all grant applications for federal funds.

A unique unit, from an organizational point of view, is the Intra-Agency Council. Although housed within VESID, this liaison group is staffed by individuals in positions funded and officially employed in other offices in the Department. These individuals serve as liaison officers to each of the major offices in the Department to better serve and offer assistance to individuals of all ages with disabilities. The Intra-Agency Council has developed a *Plan for Ensuring Access for Individuals with Disabilities to All New York State Education Department Programs and Services*. This plan describes how all Department programs and services will be made accessible to individuals with disabilities and outlines a process by which the Council will monitor the implementation of the plan. This Plan emerged from a year-long process of evaluating access to all programs and services offered either directly by the Department or under the purview of the Department.

A Coordinator of Quality Assurance oversees the monitoring of each of the programs that receive funds from various State or Federal sources. This monitoring includes on-site review for compliance with statutory and/or regulatory requirements and adherence to program and administrative procedures required under VESID policy, focusing on the accessibility, quality, and cost effectiveness of the services being provided to individuals with disabilities. In addition, review of programs and services ensures equal access for all persons with disabilities. In order to assure responsiveness and early resolution to individual complaints, the Service Review Unit has been established. This unit follows-up on complaints made by individuals with disabilities or their families with the objective of early resolution of most concerns as an alternative to the lengthy and costly formal hearing procedures or litigation.

The Coordinator of Program Development, Technical Assistance and Support Services is responsible for training and outreach programs and linkages with other segments of the educational system. The training and outreach programs will substantially upgrade existing programs and will be specifically geared to training both Department and contract service providers on the current policies, as well as on state-of-the-art professional information necessary for effective service delivery. This unit also conducts an ongoing public information effort so that individuals throughout the State are aware of the services available throughout the Education Department and how to access them efficiently. In addition, this unit is responsible for keeping the Office as a whole up-to-date on new trends, developments, research, and publications in the field of educational and rehabilitative services to individuals with disabilities.

A key unit in this area is dedicated to increasing and institutionalizing linkages with other segments of the educational system including schools, colleges, libraries, museums, and adult education programs. This unit emphasizes increased accessibility to all aspects of the educational system, many of which may not have been traditionally available to people with disabilities, so that adults with disabilities are not limited to the direct services of the Office of Vocational and Educational Services for Individuals with Disabilities in arranging for services to meet their educational and career objectives.

Attached is a copy of the organizational structure of the Office of Vocational and Educational Services for Individuals with Disabilities.

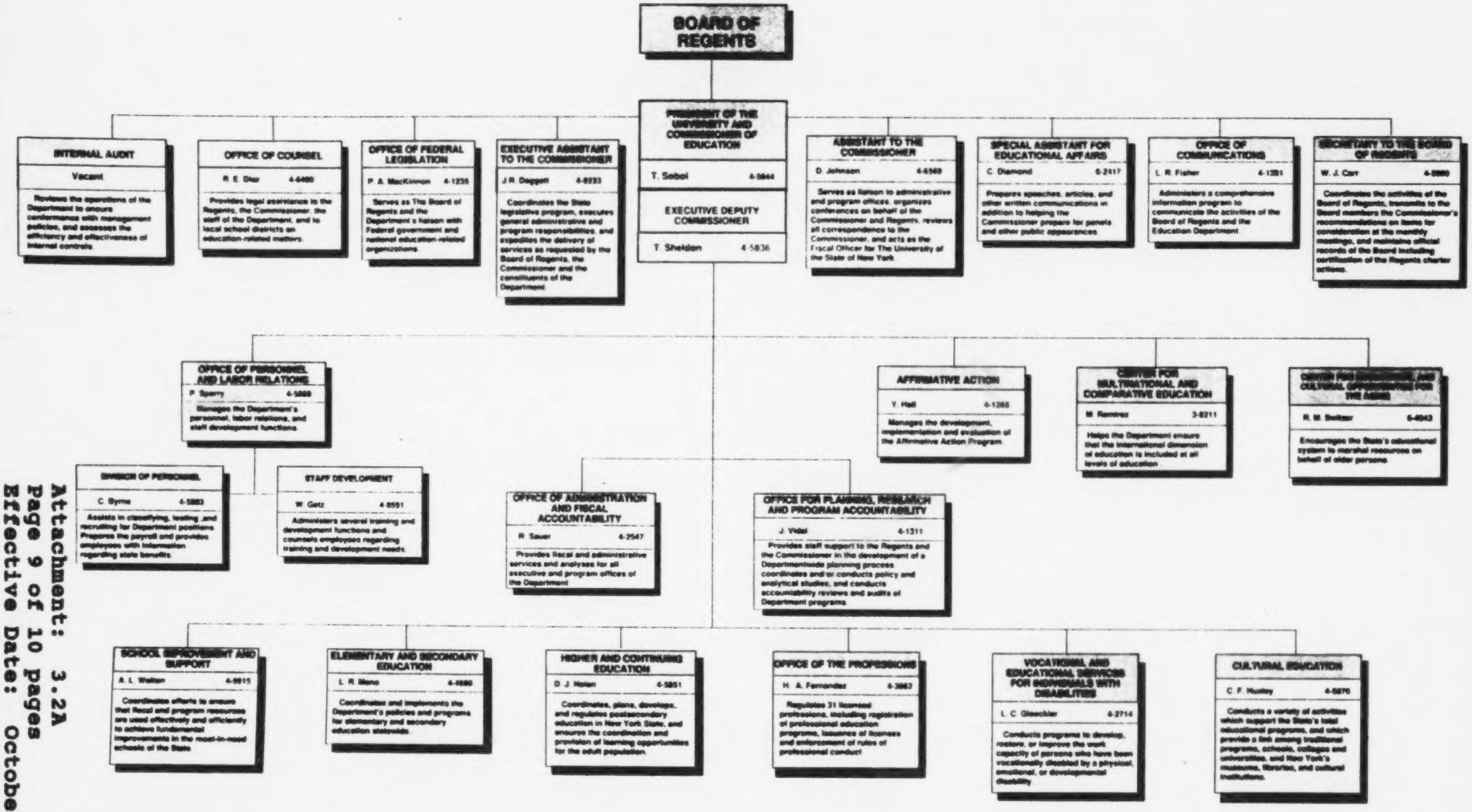
Relationship of the State Agency to the Governor and Other Agencies

The State Interagency Council for Vocational Rehabilitation was formed in 1989 to ensure that the State's vocational rehabilitation and related services are provided in a coordinated and nonduplicative manner. The Council consists of representatives of the Office of the Advocate for the Disabled, Office of Mental Health, Office of Mental Retardation and Developmental Disabilities, Department of Labor, Division of Veterans' Affairs, Commission for the Blind and Visually Handicapped within the Department of Social Services, Commission on Quality of Care for the Mentally Disabled, and the Education Department's Office of Vocational and Educational Services for Individuals with Disabilities. The agreement also established Michael Dowling, the Deputy Secretary to the Governor for Human Services, and Thomas Sheldon, Executive Deputy Commissioner of the Education Department, as cochairs of the Council.

The State Interagency Council serves as a State forum and focal point for discussion of appropriate systematic change concerning the manner in which vocational rehabilitation and related services are provided in New York. The efforts of the Council will result in more consistent eligibility criteria, (including nonduplicative assessment procedures and documentation), increased reciprocal eligibility determinations, greater access to a wider range of services across systems, and well-defined roles and responsibilities in the development and administration of options for employment and vocational training.

VESID has played a primary role in the many activities initiated through the State Interagency Council. On October 12, 1990, the State Interagency Council approved a series of far-reaching recommendations developed by its Implementation Committee that are directed at improving access to vocational rehabilitation and related services for individuals with disabilities in New York State. The Council recommendations are aimed at streamlining agency eligibility and intake procedures to allow individuals to enter the system faster. These include the use of an interagency referral form, the development of functional criteria to facilitate appropriate referrals, expanded use of interim eligibility by VESID, updating and refining State agency manuals and practices, and reciprocal acceptance of disability determination whenever possible. The Council deliberations on supported and sheltered employment focused on three major areas: establishment of basic principles and operating guidelines; funding of supported employment services; and staffing of supported employment services.

THE UNIVERSITY OF THE STATE OF NEW YORK
THE STATE EDUCATION DEPARTMENT



BOARD OF REGENTS

PRESIDENT OF THE UNIVERSITY AND COMMISSIONER OF EDUCATION
T. Sobol 4-3844

EXECUTIVE DEPUTY COMMISSIONER
T. Sheldon 4 5836

INTERNAL AUDIT
Vacant
Reviews the operations of the Department to ensure conformance with management policies, and assesses the efficiency and effectiveness of internal controls.

OFFICE OF COUNSEL
R. E. Diaz 4-6400
Provides legal assistance to the Regents, the Commissioner, the staff of the Department, and to local school districts on education-related matters.

OFFICE OF FEDERAL LEGISLATION
P. A. MacKinnon 4-1235
Serves as The Board of Regents and the Department's liaison with Federal government and national education-related organizations.

EXECUTIVE ASSISTANT TO THE COMMISSIONER
J.R. Daggett 4-8733
Coordinates the State legislative program, executes general administrative and program responsibilities, and expedites the delivery of services as requested by the Board of Regents, the Commissioner and the constituents of the Department.

ASSISTANT TO THE COMMISSIONER
D. Johnson 4-6560
Serves as liaison to administrative and program offices, organizes conferences on behalf of the Commissioner and Regents, reviews all correspondence to the Commissioner, and acts as the Fiscal Officer for The University of the State of New York.

SPECIAL ASSISTANT FOR EDUCATIONAL AFFAIRS
C. Diamond 6-2417
Prepares speeches, articles, and other written communications in addition to helping the Commissioner prepare for panels and other public appearances.

OFFICE OF COMMUNICATIONS
L. R. Fisher 4-1201
Administers a comprehensive information program to communicate the activities of the Board of Regents and the Education Department.

SECRETARY TO THE BOARD OF REGENTS
W. J. Carr 4-5880
Coordinates the activities of the Board of Regents, transmits to the Board members the Commissioner's recommendations on items for consideration at the monthly meetings, and maintains official records of the Board including certification of the Regents charter actions.

OFFICE OF PERSONNEL AND LABOR RELATIONS
P. Sperry 4-5880
Manages the Department's personnel, labor relations, and staff development functions.

DIVISION OF PERSONNEL
C. Byrne 4-5883
Assists in classifying, testing and recruiting for Department positions. Prepares the payroll and provides employees with information regarding state benefits.

STAFF DEVELOPMENT
W. Getz 4-8591
Administers several training and development functions and counsels employees regarding training and development needs.

AFFIRMATIVE ACTION
Y. Hall 4-1265
Manages the development, implementation and evaluation of the Affirmative Action Program.

CENTER FOR MULTINATIONAL AND COMPARATIVE EDUCATION
M. Ramirez 3-8211
Helps the Department ensure that the international dimension of education is included at all levels of education.

CENTER FOR [illegible] AND CULTURAL [illegible] FOR THE AGING
R. M. Beltzer 6-4043
Encourages the State's educational system to marshal resources on behalf of older persons.

OFFICE OF ADMINISTRATION AND FISCAL ACCOUNTABILITY
R. Sauer 4-2547
Provides fiscal and administrative services and analyses for all executive and program offices of the Department.

OFFICE FOR PLANNING, RESEARCH AND PROGRAM ACCOUNTABILITY
J. Vidal 4-1311
Provides staff support to the Regents and the Commissioner in the development of a Departmentwide planning process, coordinates and/or conducts policy and analytical studies, and conducts accountability reviews and audits of Department programs.

SCHOOL IMPROVEMENT AND SUPPORT
A. L. Walton 4-0015
Coordinates efforts to ensure that fiscal and program resources are used effectively and efficiently to achieve fundamental improvements in the most-in-need schools of the State.

ELEMENTARY AND SECONDARY EDUCATION
L. R. Mano 4-4960
Coordinates and implements the Department's policies and programs for elementary and secondary education statewide.

HIGHER AND CONTINUING EDUCATION
D. J. Nolan 4-5851
Coordinates, plans, develops, and regulates postsecondary education in New York State, and ensures the coordination and provision of learning opportunities for the adult population.

OFFICE OF THE PROFESSIONS
H. A. Fernandez 4-3862
Regulates 31 licensed professions, including registration of professional education programs, issuance of licenses and enforcement of rules of professional conduct.

VOCATIONAL AND EDUCATIONAL SERVICES FOR INDIVIDUALS WITH DISABILITIES
L. C. Gloeckler 4-2714
Conducts programs to develop, restore, or improve the work capacity of persons who have been vocationally disabled by a physical, emotional, or developmental disability.

CULTURAL EDUCATION
C. F. Huxley 4-5870
Conducts a variety of activities which support the State's total educational programs, and which provide a link among traditional programs, schools, colleges and universities, and New York's museums, libraries, and cultural institutions.

Attachment: 3.2A
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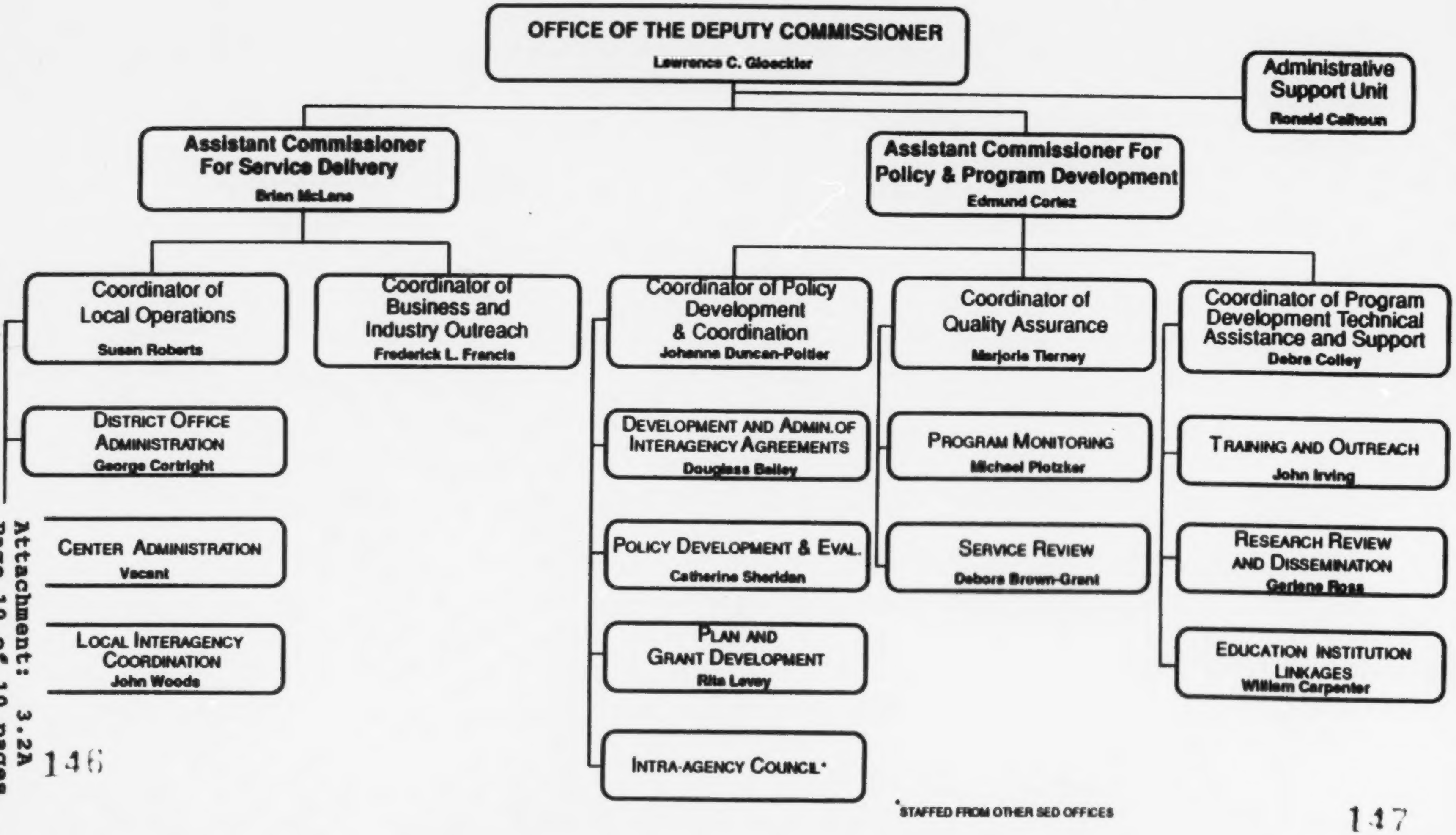
Office of Vocational and Educational Services for Individuals with Disabilities



OFFICE OF THE DEPUTY COMMISSIONER
Lawrence C. Gloeckler

Administrative Support Unit
Ronald Calhoun

Assistant Commissioner For Service Delivery
Brian McLane

- Coordinator of Local Operations
  Susan Roberts
  - DISTRICT OFFICE ADMINISTRATION
    George Cortright
  - CENTER ADMINISTRATION
    Vacant
  - LOCAL INTERAGENCY COORDINATION
    John Woods
- Coordinator of Business and Industry Outreach
  Frederick L. Francis

Assistant Commissioner For Policy & Program Development
Edmund Cortez

- Coordinator of Policy Development & Coordination
  Johanna Duncan-Poitier
  - DEVELOPMENT AND ADMIN. OF INTERAGENCY AGREEMENTS
    Douglass Bailey
  - POLICY DEVELOPMENT & EVAL.
    Catherine Sheridan
  - PLAN AND GRANT DEVELOPMENT
    Rita Levey
  - INTRA-AGENCY COUNCIL*
- Coordinator of Quality Assurance
  Marjorie Tierney
  - PROGRAM MONITORING
    Michael Plotzker
  - SERVICE REVIEW
    Debora Brown-Grant
- Coordinator of Program Development Technical Assistance and Support
  Debra Colley
  - TRAINING AND OUTREACH
    John Irving
  - RESEARCH REVIEW AND DISSEMINATION
    Gerlene Ross
  - EDUCATION INSTITUTION LINKAGES
    William Carpenter

*STAFFED FROM OTHER SED OFFICES

Attachment: 3.2A
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ATTACHMENT 6.1(a)(15)A: DESCRIPTION OF HOW REHABILITATION ENGINEERING SERVICES WILL BE PROVIDED TO ASSIST AN INCREASING NUMBER OF INDIVIDUALS WITH HANDICAPS

The application of technology to assist individuals with disabilities is a complex and continually expanding field. The utilization of technology, whether in the form of assistive aids/adaptive devices or in identifying alternative approaches and strategies, presents important resources for rehabilitation and human service personnel, educators, employers or anyone interested in making the most effective use of the capabilities of persons with disabilities.

Rehabilitation engineering and technology has been an essential component of the Office of Vocational and Educational Services for Individuals with Disabilities (VESID) for many years. The delivery and utilization of these services involves a wide array of resources and expertise. Staffing, facilities, equipment and information resources come together to form VESID's current service support network from which services respond to functional needs of consumers with differing problems and conditions. Assistive technology is a service which can be provided in all phases of the rehabilitation process including the evaluation and eligibility determination phase. When applying these types of services to individuals with disabilities, VESID maintains the following goals and expectations:

- o increase independence and quality of life;
- o increase performance and productivity;
- o expand vocational options;
- o enable individuals with severe disabilities to be more actively integrated into service options;
- o increase the number of successful placements; and
- o reduce the amount of supportive services needed.

During the past ten years, changes have occurred, expanding the nature and scope of rehabilitation engineering and technology and how it relates to assisting persons with disabilities. Recently, passage of key legislation (P.L. 100-407, ADA) has further acknowledged the role that these services can and should play in the lives of consumers. Throughout this continually evolving process there have been a number of underlying, fundamental assumptions which are considered in the provision of services of this nature, including:

- o Rehabilitation engineering/technology is better applied by an interdisciplinary team where the consumer is a primary participant.
- o Anyone can be the catalyst but the presence of a single coordinated approach is crucial.
- o Results obtained will vary proportionally with the quality of services provided and their direct relevance to the needs identified.
- o Development of expertise in rehabilitation technology is an ongoing activity for which adequate human and fiscal resources must be budgeted.

Training

Achieving the promise of technology requires the availability of a number of skilled service providers. With the application of technology ranging from specialized computers and toothbrushes to modified vehicles and adapted work sites, the staff's need to effectively match an individual's needs with appropriate technology is demanding. Rehabilitation engineers, technology specialists, occupational, speech and other therapists, equipment vendors, fabrication and repair specialists and others illustrate the wide variety of qualified service providers needed to offer comprehensive assistive technology services. In most situations, these individuals will not work within a single agency or program. Locating available service providers and developing resources where none exist is a critical need which VESID is now addressing.

In most states the availability of qualified service providers is limited. Individuals with specialized training in assistive technologies are very difficult to locate. VESID, through the establishment of a task force, will be working to identify qualified professionals to provide in-service training to VESID counselors and evaluators to expand and upgrade the State's evaluator resource base. Training will be provided to VESID staff in conjunction with the Rehabilitation Technology Research and Training Center at the University of Connecticut, as well as other institutions which are involved in national research on this topic. VESID will continue to cooperate with the New York State Office of the Advocate for the Disabled, which has been designated by the Governor as the agency responsible for the administration of the Technology Act for Individuals with Disabilities, in order to keep abreast of new developments in this rapidly changing field.

During the next three years, VESID will provide training to all staff on how particular technological applications can be identified, assessed and utilized. VESID has also established a work group with district office staff representation to identify rehabilitation technology techniques which will enhance consumer independence and opportunities for employment. VESID will continue to provide training opportunities to professional staff on advances in the rehabilitation technology field which will have a positive impact on VESID consumers.

Public Awareness

The vast majority of the general public, as well as significant numbers of professionals and consumers with disabilities, have a limited awareness of assistive technology or rehabilitation engineering. A surprising number of individuals are almost totally unaware of the current resources and services available to assist individuals with functional limitations to perform independent living, educational, vocational, or recreational activities.

The role that assistive technology can play during the integration into school, work and independent living situations needs to be more widely known and understood. The delivery of assistive technology services is directly impacted by the awareness of the general public, service providers and the consumer as to what is available. Efforts to increase public awareness and raise the knowledge of consumers and education, rehabilitation, health care and other professionals are an important VESID mission. It is intended that awareness sessions be provided via cooperative ventures with other State agencies in developing a statewide information clearinghouse and regional resource centers at each district office.

To assist individuals with a disability gain access to technology aids and devices that can assist the individuals with employment, VESID has installed the ACCESS-ability computer program system in each of the district offices. The ACCESS-ability system is updated every year and contains up-to-date information on aids and devices available for the varying needs of individuals with disabilities. This system can identify both broad categories of devices as well as specific devices for any disability. The use of this system allows VESID to serve the needs and increase the quality of life for persons with disabilities.

Coordination of Services Between Agencies and Programs

The resources and support needed to deliver a comprehensive array of rehabilitation engineering and technology services to the full spectrum of consumers mandate the need for coordinated service delivery because the need for these services transcends all ages and disabling conditions. It is unrealistic to expect that the resources and capabilities of any single agency or program can meet all the needs of those individuals that it directly serves. This has encouraged VESID to develop cooperative agreements and collaborative relationships with other program offices and agencies by:

- bringing together the broad spectrum of State agencies and professionals in the fields of rehabilitation and education; and
- developing a framework for a strategic plan to address:
  - the identification of available funding streams;
  - networking (electronic or otherwise) the existing technology service systems at the State, regional and interstate levels; and
  - modifying the existing laws and regulations which impact on services to ensure uniform access to resources by consumers.

Presently, VESID has collaborative relationships with such agencies as the Office of Mental Retardation and Developmental Disabilities, Office of Mental Health, Department of Health, Department of Labor, Office of Advocate for the Disabled and United Cerebral Palsy facilities.

Summary

The rapid pace of technology is creating new opportunities for individuals with disabilities on a daily basis. The challenge is to stay informed of those new developments in order to provide the most efficient and effective services available. In offering the proposed services to professional staff, VESID service users and service providers will be better prepared to give individuals with disabilities the necessary tools to become more independent and productive.

ATTACHMENT 6.2 (e) A: UTILIZATION OF REHABILITATION FACILITIES

VESID district office managers have the lead responsibility for determining the number of units of service to be purchased under the unified contract system. This includes contacting facilities at approximately the middle of the contract year in order to begin developing contract utilization plans with final recommended plans to be submitted to central office from three to four months before the beginning of the next contract period. The most essential element of this policy is that units of services that are projected for any year are based upon the actual delivery of services in the previous year.

Managers are guided by the following procedures:

- For those agencies not currently under contract or contract agencies with services not under contract, the most complete service utilization data available should be used in the contract utilization planning process.
- The current multiyear agreement states that "Each Client Utilization/Referral Plan (CU/RP) for subsequent period shall be set at the actual utilization level achieved in the most recently completed twelve month period." Therefore, when renewing existing contracts, the most current 12 month numbers available should be used unless compelling reasons exist to warrant a variance.
- The projections could be adjusted on the basis of compelling documentation to justify an alternative projection. Such adjustments are initiated at the request of the rehabilitation facility and are subject to approval by VESID.
- This level should be communicated to the facility in writing as the projected level for the upcoming contract year.
- If the facility wishes a modification, it should submit its request with a rationale to the VESID district office. The facility should meet with the district office manager or staff to discuss its rationale. VESID central and district office staff will then analyze the requested modification and make a decision which will be communicated to the facility in writing.

- Other than services provided through grants, pilot programs and other agency contracts, all services provided by a rehabilitation facility to VESID consumers should be included in a unified contract.

- Where historical utilization is not the most reasonable guide for planning utilization in the coming contract year, either because the district manager is aware of major changes in the office's utilization patterns or because the provider is undergoing major expansion or contraction, a utilization plan at variance with historical utilization may be adopted. In those cases where the CU/RP is contrary to the trend of actual, historical utilization, written documentation and justification of that fact must be provided to the manager of district office administration for prior approval. Providers should be informed of the need for obtaining prior approval in such instances so that they will not assume that the CU/RPs are final.

- New programs and services which VESID may wish to purchase or which may arise after the contract is in place (mid-year) would be funded outside the provisions of the contract until the following contract year.

ATTACHMENT 6.6(a)A: SERVICES FOR WHICH THERE IS AN ECONOMIC NEEDS TEST

VESID has adopted a new Economic Need Policy for the provision of services. This new policy was developed on the recommendations of a task force convened to comprehensively study economic need issues. Major changes in the new policy include:

- an increase of 15 percent in the eligibility income threshold, after converting from net to gross income for ease of calculation;
- a simplified methodology for calculating economic need, which relies in most cases on Federal income tax return information;
- a compilation of all policy statements regarding procedures for determining economic need into one comprehensive policy; and
- clearer definitions of terms used in calculating economic need (e.g., income, assets and unusual expenses).

The financial need of individuals is taken into consideration to determine their ability to participate in the costs of their services. In this way, VESID's limited resources can be targeted toward those individuals most in need. In addition, consumers' participation in the cost of services may strengthen their commitment to the success of their rehabilitation program.

The following services may not be provided until available consumer resources have been applied toward the cost:

1. all training services, including tuition and related fees at colleges and universities, with the exception of training at approved rehabilitation facilities, work-study, on-the-job training and cost-effective skills training;
2. physical and mental restoration services;
3. maintenance (except during evaluation);
4. medical care for acute conditions arising during the program;
5. transportation (except during evaluation, special transportation and transportation to attend an administrative review or fair hearing);

6. books and related training materials;

7. occupational tools and equipment;

8. stocks and supplies for self-employment;

9. occupational and business licenses;

10. modifications to homes, vehicles and work sites;

11. telecommunications, sensory and other technological aids and devices;

12. driver training (except at approved rehabilitation facilities and regionally accredited adaptive driver training centers or other driver training providers if the cost to VESID does not exceed the cost at the regionally accredited adaptive driver training center closest to the consumer);

13. services to other family members; and

14. all other goods and services not exempt in State regulation.

9.1(a)A: SUMMARY OF THE RESULTS OF THE COMPREHENSIVE, STATEWIDE ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH SEVERE HANDICAPS RESIDING WITHIN THE STATE AND THE STATE'S RESPONSE TO THE ASSESSMENT

The following section summarizes the results of the assessment relating to the need for supported employment services, including information provided by the State special education agency.

Assessment of Needs for Supported Employment Services

The number of people who may benefit from supported employment exceeds 60,000 in New York State. This is the sum of current participants in various day services programs, such as sheltered employment, day treatment and day training, as well as estimates of unserved adults. This is expanded by the numbers of students with disabilities who annually exit secondary education and may need this service.

Interagency collaboration has improved access to more precise data on which to plan resources and activities geared to meet identified needs for services. The Office of Mental Retardation and Developmental Disabilities (OMRDD), Office of Mental Health (OMH), and the State Education Department's Office for Special Education Services (OSES) have provided planning data for three major groupings of supported employment service consumers: adults with developmental disabilities, adults with severe and persistent mental illness and young adults with disabilities annually exiting secondary educational programs.

A fourth population identified as needing supported employment includes adults with learning disabilities, traumatic brain injuries, blindness, deafness, or other severe disabilities, who traditionally have not been fully represented in the adult service system. Data is not routinely collected about this group. Knowledge about these individuals' needs comes primarily from public hearings and other outreach contacts with consumer groups and families.

Adults with Developmental Disabilities: The New York State Developmental Disabilities Plan for 1990-95 anticipates that individuals needing supported employment services will grow from the current base of 4,352 to 8,530, an increase of 4,178 by mid-1995. During the four year period from 1991 to 1995, interagency planning efforts will address supporting the Office of Vocational and Educational Services for Individuals with Disabilities (VESID) necessary to meet this need. Individuals to be served will include those moved from more segregated day services settings as well as those not yet served:

Current Setting	Expected Referrals
Developmental Centers	27
Day Treatment Programs	199
Day Training Programs	56
Sheltered Workshops	2,655
New Consumers	1,268
Total Expansion	4,205

A unified interagency system for individual tracking and program specific reporting has been established to enable a quarterly review of progress being made by providers in achieving planned outcomes. Continuing communication at the local and State levels between OMRDD and VESID allows for coordination of problem solving and resource planning.

Adults with Severe and Persistent Mental Illness: At the present time, opportunities for achieving employment outside of institutional activity programs are limited. Of the total number of people served by the mental health system, only 11 percent participate in any form of community support program, including options for supervised housing, education, and vocational rehabilitation. A review of OMH's service system by the New York State Commission on Quality of Care for the Mentally Disabled noted the following:

- 79 percent of the outpatients in the study identified needs for economic self-sufficiency, including help for problems with literacy and employment;
- 42 percent of the outpatients had specific problems in obtaining jobs; and
- only 15 percent of a representative sample of 61 outpatients for whom more detailed study was done had the opportunity to attend either a sheltered workshop or supported work program at any point during the previous two years.

The OMH Bureau of Psychiatric Rehabilitation estimates that 16,000 persons with severe and persistent mental illness could benefit from vocational services. Only 3,500 slots are available in the special employment programs established by the Bureau for this purpose. The estimate of need does not include the 2,700 sheltered workers who have mental illness and might benefit from more community-based supported employment options.

The report from the Needs Assessment Unit of the OMH Bureau for Planning Assistance and Coordination, dated October 18, 1990, defines the Certificate of Need (CON) Methodology for guiding the development of new and expanding outpatient services at the county level, including Intensive Psychiatric Rehabilitative Treatment (IPRT) services. IPRT is the psychiatric rehabilitation counseling service being created to assist individuals to explore, develop and establish educational, vocational and other life goals. This program is the likely source for OMH referrals to VESID for supported and transitional employment in the future. The methodology projects that 2,330 slots will need to be established. Once fully operational, services will be provided to a weekly average of 3,628 persons, who will receive 13.4 hours per week of IPRT services per person for service periods of unlimited duration.

In anticipation of this action by OMH, efforts are underway to develop the necessary linkages between VESID services and the developing IPRT programs. Through joint agreement, five initial "Systems Integration Program" sites will be established to ensure closer collaboration in designing services and coordinating planning between OMH and VESID in the delivery of supported and transitional employment services to this population.

Young Adults Exiting Secondary Education Programs: There is a growing demand for services for youth with disabilities and their families. The most recent State Education Department data, prepared and reported under the requirements of Part 618(b)(3) of the Individuals with Disabilities Education Act, indicates that a total of 19,037 students with disabilities exited the educational system in school year 1989-1990. Of this total, 7,651 (40.2 percent) graduated with regular diplomas, and presumably are able to proceed with pursuing educational and employment options. The remaining 11,386 individuals (59.8 percent) are the likely candidates for supported employment options. Of the 11,386 potential supported employment candidates, the distribution of disability by type of school exit is as follows:

Disability	IEP Complete	Max Age	Dropped Out	Total
Mental Retardation	974	283	480	1,737
Hard of Hearing	10	4	16	30
Deaf	18	5	9	32
Speech/Language	11	0	75	86
Visual/Blindness	3	0	9	12
Emotional	261	48	2,334	2,643
Orthopedic	17	5	8	30
Other Health	43	19	24	86
Learning Disabilities	1,065	119	5,153	6,337
Multihandicapped	231	93	69	393
Total	2,633	576	8,177	11,386
% of All Exits	13.8%	3.0%	43.0%	59.8%

Regarding anticipated needs for services by exiting children and youth with disabilities for school year 1990-91, the four highest frequencies of projected needs for the major categories of service possibilities include needs for counseling/guidance (59.2 percent), evaluation (12.9 percent), vocational training (8.8 percent), and transportation (6.9 percent). This projection is based on historical uses of vocational rehabilitation services, and does not separately address the option of supported employment.

Emphasis in VESID's supported employment program has included targeting in-school youth who can be identified as exiting during the current school year. During the 1991-92 year, more than one-quarter of the intensive service projects will include in whole (31 sites) or in part (30 sites) services to youth exiting school. The combined State and Federal investment will total $4.2 million for these programs, whose goals are to serve 926 people and place, train and transition 746 of these people to extended supported employment. The minimum number of exiting youth to be served will be 517, with 397 employed. Additional program development resources have been requested to extend services more completely to this group.

Assessment Activities

In addition to the above described assessment, VESID has completed a number of activities that assess the rehabilitation needs of individuals with disabilities in New York State. These activities include assessment of needs by the State Interagency Council for Vocational Rehabilitation, VESID District Office regional meetings, Matrix Consensus Group and the State work group on counselor training. The following sections summarize these activities.

State Interagency Council for Vocational Rehabilitation: The Interagency Council for Vocational Rehabilitation was formed in 1989 to ensure that the State's vocational rehabilitation and related services are provided in a coordinated and nonduplicative manner. The Council consists of representatives of the Office of the Advocate for the Disabled, Office of Mental Health, Office of Mental Retardation and Developmental Disabilities, Department of Labor, Division of Veterans' Affairs, Commission for the Blind and Visually Handicapped within the Department of Social Services, Commission on Quality of Care for the Mentally Disabled and the Education Department's Office of Vocational and Educational Services for Individuals with Disabilities. The agreement also established Michael Dowling, the Deputy Secretary to the Governor for Human Services, and Thomas Sheldon, Executive Deputy Commissioner of the Education Department, as cochairs of the Council.

The Interagency Council serves as a State forum and focal point for discussion of appropriate systematic change concerning the manner in which vocational rehabilitation and related services are provided in New York. The efforts of the Council will result in more consistent eligibility criteria (including nonduplicative assessment procedures and documentation), increased reciprocal eligibility determinations, greater access to a wider range of services across systems, and well-defined roles and responsibilities in the development and administration of options for employment and vocational training.

VESID has played a primary role in the many activities initiated through the Interagency Council. On October 12, 1990, the Interagency Council approved a series of far-reaching recommendations developed by its Implementation Committee that are directed at improving access to vocational rehabilitation and related services for individuals with disabilities in New York State. The Council recommendations are aimed at streamlining agency eligibility and intake procedures to allow individuals to enter the system faster. These include the use of an interagency referral form, the development of functional criteria to facilitate appropriate referrals, expanded use of interim eligibility by VESID, updating and refining State agency manuals and practices, and reciprocal acceptance of disability determination whenever possible. The Council deliberations on supported and sheltered employment focused on three major areas: establishment of basic principles and operating guidelines; funding of supported employment services; and staffing of supported employment services.

The Council also agreed that State agencies will coordinate cross-systems training efforts. Individuals with disabilities will be involved in the training and curriculum development. The target audience will consist of staff from State agencies as well as providers and the general public. This training will focus on accomplishing the following three goals:

o conducting statewide training to enhance the awareness of services provided by each State agency;

o developing and implementing cross-systems training initiatives on issues of mutual concern, including eligibility and intake procedures; and

o collecting and disseminating information on agency training activities related to vocational rehabilitation and related services.

The Long-Term Agenda Committee was also established to identify major need areas and develop recommendations for actions over the long term. The Committee addressed improving access to vocational rehabilitation and related services for unserved or underserved populations. The targeted underserved or unserved population includes women, minorities, and Vietnam Era veterans; related services include transportation, attendant care service and services for individuals who are deaf.

Services for Individuals with Mental Illness: The Office of Mental Health (OMH) is responsible for providing programs and services to individuals with mental illness in New York State. This agency provides services in the areas of research, prevention, care, treatment, rehabilitation, education and training. OMH operates psychiatric hospitals and administers a wide range of community based programs and services through five regional offices in cooperation with local governments and community organizations and agencies.

OMH provides many psychiatric rehabilitation programs that are similar in nature to VESID programs. VESID provides services to consumers under the care of OMH through case services, sheltered employment and supported employment. OMH is a cosigner of the State's Memorandum of Agreement for Supported Employment.

Following the directives of the Governor and the Board of Regents, VESID and OMH convened a training design workshop under the direction of the Matrix Research Institute. The group included VESID and OMH staff, executives from a representative array of provider agencies, and primary consumer and family members.

The work group developed a strong consensus around a general framework for the VESID and OMH pilot programs to be developed in each of the five New York State regions. The work group consensus defined an administrative structure, the need for evaluative criteria and the demand for staff training.

A follow-up to this work group was held in January, 1991. Building upon the initial meeting, this representative group established basic principles for the integration of services and the specific parameters of a plan for the integration of VESID and OMH services.

Forum for the Development of Priorities for the Office of Vocational and Educational Services for Individuals with Disabilities: VESID's priorities provide a framework for activities to be undertaken in Federal Fiscal Years 1992-1994. In order to develop these priorities, VESID gathered information about the current needs of people with disabilities across the State through a series of work group meetings held throughout 1990. Individuals with disabilities, families, individuals representing other State agencies, rehabilitation facilities, schools, professionals and interested parties, as well as VESID staff, participated in the meetings. As a result, the priorities developed are, in large part, the result of guidance and direction provided by both individuals with disabilities and providers in the rehabilitation and education communities.

Following the development of these statewide priorities, each of VESID's 15 district offices convened meetings to identify regional needs. The regional meetings involved groups consisting of people currently or previously served by VESID, individuals representing not-for-profit service providers and invited representatives from State and local governments. Particular emphasis was placed on including representatives knowledgeable about underserved and minority populations in their communities. These individuals were asked to assist the district offices by providing ideas and suggestions that could be used to improve the delivery of vocational and educational services for that district office during the coming year. These planning sessions provided approximately 400 individuals in the community with an opportunity to participate in the development of local service plans. The local plans will incorporate VESID priorities of increasing access to service and improving integrated employment options for individuals with disabilities.

State Work Group: A State work group was convened in April 1990 to review and analyze the training needs identified from surveys given to State constituents, and to assist in the preparation of a report reflecting New York State's training needs assessment. The work group was coordinated by representatives from the New York State Office of Vocational and Educational Services for Individuals with Disabilities and the Commission for the Blind and Visually Handicapped (CBVH), and included representatives from the Client Assistance Program, New York State Association of Rehabilitation Facilities, Hofstra University, Independent Living Centers, International Center for the Disabled, New York City Technical College, Cornell University, and the Regional Rehabilitation Continuing Education Program for Region II.

The highest priority for training was given to the recruitment of additional rehabilitation counselors. In addition, a need for knowledge in the areas of deafness services, psychiatric disabilities, multicultural issues, learning disability and traumatic brain injury was deemed as having a high priority. Moreover, due to the critical shortages of trained personnel in the areas of rehabilitation teaching and orientation and mobility for the blind and visually impaired, there is a need for at least one new undergraduate level program to be established to offer basic courses in blindness issues.

ATTACHMENT 9.1(c)A.: CHANGES IN POLICY RESULTING FROM STATEWIDE STUDIES AND ANNUAL PROGRAM EVALUATION

During the past year, the New York State Office of Vocational and Educational Services for Individuals with Disabilities (VESID) has made significant reforms in two major program areas as a result of statewide studies and evaluation of the effectiveness of the program. The first major policy change was to improve access to services for persons with disabilities. The second such program improvement was to revise the methodology and thresholds used for determining consumers' participation in the cost of some services. The policy changes and the studies that led to them are described below.

Improving Access to Services for Individuals with Disabilities

All persons with disabilities should have uncomplicated access to services that might improve their employability and independence. In the past, the vocational rehabilitation program has been criticized for unnecessarily delaying the application and eligibility processes for services. In order to evaluate program effectiveness in this area, VESID conducted a study of the length of time expended from the point of application for services from VESID to determining a person's eligibility. A time-in-status study was undertaken to look at the movement of cases through the various case process statuses, concentrating on the time it takes to move from applying for services (Status 02) to being found not eligible (Status 08), or being found eligible and beginning to develop a plan for services (Status 10). In order to determine if there was a relationship between the length of time and the outcome of the case, cases of persons who were successfully rehabilitated were compared with those who were found ineligible for services.

For both 1989 and 1990, the Research Review and Dissemination Unit used the existing VESID database to examine 381 cases closed as rehabilitated and 389 cases closed ineligible or before eligibility was determined. The results of the study show that the median length of time from when a person applies for services to when they are determined eligible or their case is closed is less than half as long for persons who are subsequently provided services and placed into employment. The median length of time from application to case closure for those found ineligible was 227 days, while it took only 107 days to determine the eligibility of persons who were later rehabilitated.

The data were also analyzed by referral source. Results showed that referrals from some sources, such as psychiatric centers, rehabilitation facilities and hospitals, resulted in more rapid eligibility decisions. Referrals from other sources, such as welfare agencies, schools, state employment services and private physicians, took significantly longer.

While a number of explanations for these findings could be offered, comments from consumers that were collected in past satisfaction surveys pointed to long delays as a common reason for their discontinuing the application process. In addition, the differences among referral sources seemed to indicate that criteria for appropriately referring someone to VESID may not be clearly understood by all organizations and individuals serving persons with disabilities. The results indicate that people were having difficulty gaining access to VESID services in a timely and consistent manner.

To improve access to services for individuals with disabilities, VESID developed a plan to improve the referral, application, eligibility and plan development process for consumers. This plan included identification of the impediments to access, proposed solutions, and implementation strategies, and is predicated on the following principles:

1. VESID's services shall be provided with dignity and respect for consumers and their families; policies and procedures shall be clear, concise, readily available, and implemented consistently throughout the State.

2. VESID's services leading to employment and employment itself shall be provided in the most integrated community based setting that is available.

3. VESID shall encourage every consumer to be an active participant in establishing intermediate and long-range educational and vocational goals and in choosing and pursuing strategies to achieve maximum career potential.

4. The consumer and the family are a primary source of information about vocational aspirations, interests, abilities and goals, as well as eligibility and need for services.

5. VESID shall collect and require only that information directly relevant to eligibility and the educational and vocational goals of the consumer.

6. VESID shall avoid duplication of assessments by using existing evaluations and relying on information provided by other agencies to the fullest extent possible.

The plan to improve consumer access to services was designed to achieve three major objectives:

- provide services to individuals as quickly as possible;
- simplify and clarify the steps in the process of entering the vocational rehabilitation system; and
- provide the highest quality services possible.

In developing the new policies, there was extensive participation and support both within and outside the Department. Each district office developed an "access committee," comprised of professional and support staff who analyzed current policies and procedures and identified impediments to efficient and high quality services. Committees of district office and central office staff worked to draft extensive revisions in existing policies pertaining to referral, application, eligibility and planning processes. The Department's Division of Electronic Data Processing and Division of Administrative Analysis assisted in redesigning forms, automated records, data collection and entry procedures to help make the process of obtaining vocational rehabilitation services much easier and faster, more understandable and more supportive of the goals and aspirations of those we serve.

Once the policies were drafted, a review group of district office staff from across the State helped to fine-tune the new procedures before they were sent to all staff for comment. Throughout the process, VESID coordinated its activities with the State Interagency Council for Vocational Rehabilitation. The proposed policies were reviewed by members of the State Interagency Council and the final version reflected their suggestions as well as those of VESID staff.

In January 1991, VESID issued a comprehensive series of new and integrated policies to guide district office professional and support staff to better serve consumers from the point of referral or initial contact through the development of an Individualized Written Rehabilitation Plan (IWRP). The new policies emphasize that the individual seeking services is a key participant and primary source of information throughout the process. The policies are intended to encourage the counselor to:

- exercise professional judgment and skills;

- rely on the applicant to describe his or her disability and goals;
- explore options for services with the applicant;
- eliminate unnecessary steps and nonessential documentation;
- tailor assessments and services to the needs of individual applicants; and
- recognize the importance of services available from other agencies to support an individual's employment goals and to enhance the ability of the individual to live more independently.

The changes are intended to eliminate unnecessary procedures, improve quality and consistency of services, and enable professional staff to devote more time to counseling activities. The policies represent VESID's belief that professional counselors are able to make reliable and insightful decisions based on their extensive education, training and experience. In addition, a comprehensive training plan has been designed and is being conducted for all VESID staff.

Determination of Consumer Participation in the Cost of Services

Because of inadequate funding, VESID has been forced to apply economic need requirements to some services in order to target limited resources to those persons most in need of assistance. However, economic need restrictions have consistently been cited as a major impediment to access to services for persons in need of vocational rehabilitation services.

Last year, a Task Force on Economic Need, made up of representatives from VESID district offices, central office and State Education Department Divisions of Administrative Analysis and Budget Coordination, was charged with taking a comprehensive look at current practices in determining economic need. The Task Force reviewed existing VESID policies and procedures used in determining individuals' participation in the cost of their services. The Task Force investigated the methodologies used by other New York State need-based programs, such as the Tuition Assistance Program and Social Services programs. They also reviewed the economic need determination systems used by other state Vocational Rehabilitation agencies across the nation.

The Task Force identified a number of serious problems with the methodology used by VESID: thresholds of need were below the poverty level; policies were not consistently applied; all relevant policies were not contained in one comprehensive source; forms and documentation were extremely cumbersome; and definitions of income and assets were unclear. The Task Force recommended a new model for calculating economic need and sweeping revisions to the services currently contingent on need. The Task Force also developed some preliminary program and fiscal estimates of the potential impact on current and future caseloads and funding.

To correct the identified problems and implement the Task Force's recommendations, VESID's budget request proposed increasing State funding for revised economic need criteria and policies. The approved budget allowed for $850,000 to be applied towards enhancements to the economic need system. This is the first time since 1984 that budget funding was approved to support such changes.

Although this modest appropriation level does not allow all of the recommendations of the Task Force to be incorporated or to greatly increase levels of support, it is an important first step. The policy changes include some major improvements in VESID's ability to serve persons with disabilities. These changes enable more people to obtain vocational rehabilitation services more easily and also simplify the work of the counselor in making decisions about family contributions to the cost of services. The new policy:

1. Increases by 15 percent the resources that an individual and family can retain before contributing toward the cost of their rehabilitation services.

2. Updates the list of services exempt from economic need to include job coaching and other supported employment services.

3. More clearly defines what family resources should be considered when determining economic need.

4. Uses one line from the previous year's income tax return rather than requiring the individual to produce more complicated documentation (e.g., pay stubs).

5. Allows for adjustment when income tax returns are not available or when income has changed significantly since the previous year.

6. Considers extraordinary expenses when the individual and/or family has excessive costs for housing and/or transportation.

7. More clearly defines assets, income and unusual expenses.

8. Establishes a process for dealing with family members who refuse to release financial information or to contribute.

9. Consolidates all information and forms needed to calculate an individual's contribution into one comprehensive policy.

ATTACHMENT 9.4A: METHODS TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH THE MOST SEVERE HANDICAPS

The New York State Office of Vocational and Educational Services for Individuals with Disabilities (VESID) serves approximately 75,000 individuals with disabilities each year; nearly half of these individuals have severe disabilities. VESID has undertaken program initiatives in three major areas to better serve individuals with severe disabilities:

Part One:	Improving access to services for individuals with disabilities
Part Two:	Planning with other State agencies to improve services for individuals with disabilities
Part Three:	Activities of the State Interagency Council for Vocational Rehabilitation

Detailed descriptions of these initiatives follow.

Part One: Improving access to services for individuals with disabilities

To improve access to services for individuals with disabilities, VESID developed a plan to improve access to services for consumers. This plan included the identification of impediments to access, proposed solutions, and progress toward implementation, and is described in detail in Attachment 9.1 (c)A: Changes in Policy Resulting From Statewide Studies and Annual Program Evaluation.

Part Two: Planning with other State agencies to improve services for individuals with disabilities

Interagency coordination serves a critical function in improving access to appropriate vocational training and employment opportunities for individuals with disabilities who often have multiple needs that require the intervention of more than one State agency. More than 25 percent of the individuals referred to VESID for services are referred by other State and Federal agencies. The majority of these individuals are severely and/or multiply disabled. VESID has undertaken a number of planning activities to coordinate the provision of services to these individuals. These activities focus on identifying major responsibilities, issues, expectations and implications for VESID and other such agencies serving persons with severe disabilities.

The State Interagency Council for Vocational Rehabilitation was established through a Memorandum of Agreement between Governor Mario Cuomo and Chancellor Martin Barell, acting on behalf of the Board of Regents, to ensure that the State's vocational rehabilitation and related services are provided in a coordinated and nonduplicative manner. The Interagency Council serves as a State forum and focal point for discussion of appropriate systemic change concerning the manner in which vocational rehabilitation and related services are provided in New York. The efforts of the Council will result in more consistent eligibility criteria including nonduplication assessment procedures and documentation, increased reciprocal eligibility determinations, greater access to a wider range of services across systems, and well-defined roles and responsibilities in the development and administration of additional options for employment and vocational training.

Interactions with State agencies have created a better understanding of the expectations of those agencies regarding the benefits of the programs and services available through VESID, and have provided a better understanding of the resources available through other agencies to VESID staff in meeting the needs of individuals with disabilities. These interactions will prove valuable in integrating the State's systems in such a manner that will allow the full and independent participation of individuals with disabilities, regardless of age or disability status, into our society.

The following summarizes discussions between the Office of Mental Retardation and Developmental Disabilities and the Office of Mental Health on providing services to individuals with severe disabilities in New York State.

Office of Mental Retardation and Developmental Disabilities (OMRDD): This agency is responsible for providing a full continuum of care for individuals with developmental disabilities in New York State. OMRDD ensures the development of community-based programs and services including care, treatment, rehabilitation, education and training. It plays the major role in the provision of day services to individuals who have developmental disabilities. There is an emphasis on innovative work oriented adult programs and direct involvement with VESID in the areas of sheltered employment and supported employment. This agency is a member of the State Interagency Council for Vocational Rehabilitation.

VESID provides services to consumers under the responsibility of OMRDD through case services, sheltered employment and supported employment. Ongoing interaction between OMRDD regional staff and VESID district office staff resulted in the provision of vocational rehabilitation services to approximately 13,122 individuals with developmental disabilities during fiscal year 1989-1990. This resulted in the rehabilitation of 2,775 of these individuals. OMRDD is a cosigner of the State's Memorandum of Agreement for Supported Employment. The agency initiated supported employment in New York and remains a major supporter of these relatively new programs. OMRDD is involved, along with VESID, in the development of a pilot workers' compensation program in Long Island.

Major discussions with OMRDD have centered on issues on the agenda of the State's Interagency Council for Vocational Rehabilitation. The appropriate manner of administering and funding supported employment and sheltered employment has been the major focus of negotiations. In addition, staff members of both agencies are reviewing local and district staff concerns and suggestions related to:

a. policies and procedures impeding individuals served by OMRDD from entering VESID programs;

b. exemplary programs and services for replication;

c. cross-agency training; and

d. methods of improving coordination of services.

Increasing staff awareness of agency programs and services and improving relationships will be an immediate and ongoing effort. Reciprocal information dissemination activities, including VESID contributing articles to OMRDD's newsletter, will assist in this effort. The pilot workers' compensation program in Long Island has the potential to be of great benefit with little impact on current VESID resources.

Office of Mental Health (OMH): The New York State Office of Mental Health provides emergency, inpatient, outpatient and community support services for over 500,000 individuals annually. The OMH system is a decentralized network which is comprised of a central administrative, research and planning office, five regional offices, 33 state psychiatric centers, 7,000 community residence beds and over 1,000 voluntary and State-operated community support programs. OMH provides many psychiatric rehabilitation programs that are similar in nature to VESID programs. OMH is a member of the State Interagency Council for Vocational Rehabilitation.

At the present time, opportunities for achieving employment outside of institutional activity programs are very limited. Of the total number of people served by the mental health system, only 11 percent participate in any form of community support program, including options for supervised housing, education and vocational rehabilitation. A review of OMH's service system by the New York

State Commission on Quality of Care for the Mentally Disabled noted the following:

- o 79 percent of the outpatients in the study identified needs for economic self-sufficiency, including help for problems with literacy and employment;
- o 42 percent of the outpatients had specific problems in obtaining jobs; and
- o only 15 percent of a representative sample of 61 outpatients for whom more detailed study was done had the opportunity to attend either a sheltered workshop or supported work program at any point during the previous two years.

Furthermore, while the OMH Bureau of Psychiatric Rehabilitation estimates that 16,000 persons with severe and persistent mental illness could benefit from vocational services, only 3,500 slots are available in the special employment programs established by the Bureau for this purpose. This estimate does not include the 15 percent of the State's 18,000 sheltered workers who have mental illness and who could benefit from a more community based integrated work environment.

During the last year, VESID has increased its involvement with individuals with emotional disabilities and now serves 15,747 persons with such disabilities. This population currently represents one of the largest segments of VESID's annual caseload of 74,121. Those individuals eligible for services through VESID and OMH are those needing services to ameliorate the effects of psychosis, psychoneurosis, personality disorders and, to a small extent, combined mental illness and chemical abuse.

Persons with mental illness under the responsibility of the OMH comprise:

- o 21 percent of VESID's total caseload;
- o 25 percent of service users who drop out of service after plans are written or implemented;
- o 17 percent of people who successfully conclude VESID services and are employed;
- o 15 percent of people placed in competitive employment;
- o 21 percent of people placed in sheltered employment;
- o 20 percent of people placed in supported employment; and

- 28 percent of people served by VESID who had some prior experience with higher education.

OMH and VESID Systems Integration Plans: In his 1990 and 1991 State of the State addresses, Governor Cuomo directed OMH and VESID to develop and implement a plan that integrates OMH programs with VESID's services. In continuing discussions with OMH, providers and consumers, it has been concluded that neither the mental health service system, the educational system nor the employment system is capable by itself of meeting the comprehensive needs of individuals who have mental illness, and that integration and coordination of services must incorporate the best that each system has to offer.

During the past year, staff from VESID and OMH, with input from consumers, providers, advocates and administrators, have been involved in a collaborative planning process to identify barriers and to make recommendations for improving vocational services to people diagnosed with long-term mental illness. This process was based on the recognition that understanding about the vocational potential of people with psychiatric disabilities has outpaced the system's ability to deliver appropriate services and supports and that, in order to optimize outcomes, structural changes in both systems are required.

The first step in implementing the plan to integrate services will involve the establishment of five initial Systems Integration Projects in sites which will be carefully selected to provide optimal opportunities for success. Additional technical assistance and support, including cross-systems training of all key participants, will be provided. The OMH system will contribute services drawn from its most innovative programs, including intensive case management, intensive psychiatric rehabilitation treatment, supported housing and special employment. VESID will contribute services from its most innovative employment and educational linkages initiatives, including supported employment. Based on the experiences of implementing these combinations in the initial five projects, there is a commitment by OMH and VESID to seek modifications in practice and policy on a statewide basis and to expand the number of sites.

To relate to the multiple and lifelong mental health and vocational rehabilitation service needs of persons with serious mental illness, the projects will be directed to set aside traditional systems and implement a flexible, rapid response and comprehensive range of services to respond to the needs and requests of individual consumers and their families. The minimum range of services to be provided by the initial five Systems Integration Projects will consist of all of the following essential elements of services:

1. Assured access to OMH 24-hour psychiatric emergency services, inpatient hospitalization and outpatient clinical services.

2. Assured access to, or a direct provision of, OMH case management services to assist in obtaining and maintaining ongoing community support services, including housing, health care, socialization services and ongoing personal counseling and support.

3. Direct provision of OMH intensive psychiatric rehabilitation treatment services to assist individuals develop the skills and supports needed to choose and obtain the living, learning, work and socialization settings of their choice in the communities of their choice.

4. Direct provision of VESID vocational and educational rehabilitation services to assist individuals develop the skills and supports needed to obtain and retain the academic and integrated gainful employment options of their choice.

5. Assured access to the State Education Department's full array of educational services and programs.

Improvements in access to services will provide critical changes in streamlining the time frames and documentation requirements related to the vocational rehabilitation eligibility determination process. In addition, VESID's efforts to establish linkages for individuals with disabilities to the resources and the lifelong benefits of the State's educational programs and services will provide enriched opportunities for individuals being served by the mental health system.

Part Three: Activities of the State Interagency Council for Vocational Rehabilitation

The establishment of the State Interagency Council for Vocational Rehabilitation initiated a new era of cooperative planning and service delivery by the New York State agencies which serve persons with disabilities. The purpose of the State Interagency Council is to review and make recommendations to the Governor and the Board of Regents with regard to those actions necessary to insure that vocational rehabilitation and related services offered by New York State agencies are integrated, nonduplicative, comprehensive and designed to meet the needs of persons with disabilities in such a manner as to encourage their full and independent participation in society.

The State Interagency Council determined that interagency efforts to improve access to vocational rehabilitation and related services must focus on the following two major areas: (1) a streamlined and better coordinated eligibility determination process; and (2) improved access to services by those groups who are unserved or underserved by the existing service system. Individuals with severe disabilities are greatly affected by these efforts. The following summarizes the Council's determinations.

Eligibility Determination Process: The State's system for determining eligibility for vocational rehabilitation and related services must be revised to: (1) ensure timely decisions regarding eligibility; (2) ensure that services provided reflect active consumer participation; and (3) provide for reciprocity across systems. The eligibility process will be enhanced as agencies standardize eligibility criteria to the greatest extent possible, including assessment materials and related documentation. Participation by people with disabilities in planning for rehabilitation services and documenting eligibility will be enhanced when such individuals are afforded greater knowledge about the choices available to them. Reciprocity across systems in areas related to eligibility will speed up decisions and allow counselors and related staff to consider the total needs of an individual when developing a service plan. Such coordination will create a system in which individuals with disabilities who may not be currently eligible for services of an agency are given the specific reasons for such ineligibility, and are actively assisted in referral to another agency which can better meet the applicant's current needs. Equitable and timely access will result from a coordinated system which incorporates these features:

- standardized eligibility criteria and related documentation for vocational rehabilitation and related services;
- consistent definitions, standards, personnel qualifications and measurable outcomes for all diagnostic and assessment services;
- reciprocity across agencies in the acceptance of the eligibility related documentation and disability determinations whenever possible;
- an independent mechanism for evaluation and a restructured evaluation process to provide for increased involvement of individuals with disabilities in eligibility and program decisions;

- a systematic process for the expedited provision of vocational rehabilitation services where it can be established that an individual requires limited and straightforward services; and
- an interagency training plan to provide vocational rehabilitation counselors and related agency personnel with the knowledge, skills and help to instill those attitudes necessary to effectuate positive change.

In response to these recommendations, the Interagency Council established a committee to address the long-term planning needs of the State. The Deputy Commissioner of VESID chairs the Implementation Committee, with VESID staff chairing or participating on all workgroups. VESID staff participate on the Long-Term Planning Committee and its related work groups. Many of the outcomes associated with these committees will result in improving the delivery of services to those individuals with severe disabilities.

Improved Access to Services: The Council adopted Committee recommendations that are aimed at streamlining agency eligibility and intake procedures to allow individuals to enter the system faster. These actions will have a far-reaching effect on all involved State agencies. The agencies have agreed to:

- the use of an interagency referral form and development of functional criteria to facilitate appropriate referrals;
- expanded use of interim eligibility by VESID;
- update and refine State agency manuals and practices; and
- reciprocal acceptance of disability determination.

The Council also agreed that State agencies will coordinate cross-systems training efforts. Consumers will have input into the training curriculum development, and the target audience will consist of staff from State agencies as well as providers and the general public. The goals of this training are to:

- conduct statewide training to enhance the awareness of services provided by each State agency;
- develop and implement cross-systems training initiatives on issues of mutual concern, including eligibility and intake procedures; and

- collect and disseminate information on agency training activities related to vocational rehabilitation and related services.

The Committee deliberations on supported and sheltered employment focused on the following three major areas: the establishment of basic principles and operating guidelines; the funding of supported employment services; and the staffing of supported employment services.

Principles and Operating Guidelines: Based upon Committee recommendations, the Council adopted a report entitled, "Principles and Operating Guidelines for Vocational Rehabilitation Services and Employment for Persons with Disabilities." The basic principles of the report are presented below.

1. Work is a valued activity, both for individuals and society.

2. All persons with disabilities are assumed to be capable of engaging in productive work and should have the opportunity to do so.

3. Government should encourage people with disabilities to work in the most integrated setting possible in accordance with their needs and abilities.

4. Work should help each person with a disability meet personal growth, social and financial needs.

5. Government, business, industry and organized labor should support and fund those services necessary to facilitate the ability of persons with disabilities to work.

6. Regulations and monitoring should reflect and promote the above work related principles.

Funding of Supported Employment Services: The Council agreed upon a series of immediate actions related to funding of supported employment and also indicated long-range actions that were necessary to be undertaken. Major immediate actions include:

- development of a statewide policy on integrated employment;

- identification of appropriate methods and levels of funding for integrated employment opportunities;

- development of consistent roles, responsibilities and definitions;

- development of consistent standards for services and staffing; and
- determination of the role of supported employment for children with handicapping conditions.

In addition, the Council recognized that there are activities which are deemed important to the successful establishment of a statewide integrated employment system. These actions include: establishment of a State level Federal agenda and political strategy related to the delivery of vocational rehabilitation and related services; removal of disincentives to integrated employment; increasing involvement with business, industry and labor; and the recruitment, retention and training of job coaches.

For in-depth information on the quality, scope and extent of supported employment services in New York State, refer to Attachment 1.7A.

ATTACHMENT 10.6(b)A: DESIGNATED STATE UNIT'S PLANS, POLICIES AND METHODS RELATING TO TRANSITIONING

During 1990, the Board of Regents continued a series of major policy discussions on linking services for individuals with disabilities. These discussions were used as a basis for developing a comprehensive set of policies that will guide Department activities in developing systemic linkages among educational, vocational and rehabilitation service systems. These policies were approved at the November 1990 meeting of the Board of Regents. In addition to adopting the following policies, the Board of Regents discussed the desired outcomes for each policy.

Policy Recommendations to Systemically Link Services for Individuals with Disabilities

Approved Policy #1. Each appropriate Department database will include specific information on individuals with disabilities. This information will have the capability of being disaggregated for the purpose of tracking and cross-referencing data on individuals with disabilities.

> **Desired Outcome:** A comprehensive information base will be available upon which to plan and develop programs and services, and to allocate resources to better serve individuals with disabilities.

Approved Policy #2. All necessary steps will be taken to ensure that individuals with appropriate expertise are included in the Committee on Special Education (CSE) planning process. These participants could include individuals from vocational education facilities, institutions of higher education, business and industry, independent living centers and others who are not part of the elementary, middle and secondary educational systems.

> **Desired Outcome:** The Committee on Special Education will have a comprehensive information base upon which to make program decisions related to transitional issues.

Approved Policy #3. A clearinghouse mechanism which utilizes existing Department training networks to provide outreach and training for parents and students with disabilities on a wide range of programs and services available to such students and their families will be established.

> **Desired Outcome:** Students with disabilities and their parents will become knowledgeable and active participants in their educational and vocational planning.

Approved Policy #4. An appropriate vocational assessment will be required for all secondary students with disabilities except in extraordinary instances in which the Committee on Special Education can document that such an assessment cannot or should not be conducted. The Department will provide a comprehensive training and technical assistance program to ensure that the best practices are implemented statewide.

> **Desired Outcome:** Students with disabilities will have appropriate vocational goals included in their Individualized Education Programs (IEP). These goals will serve as the basis for transitional planning for such students.

Approved Policy #5. Preservice and in-service training programs will be expanded for elementary and secondary school teachers, special and occupational educators, vocational rehabilitation and guidance counselors, administrators and higher and adult education professionals to better prepare such persons for working with individuals with disabilities.

> **Desired Outcome:** Professional staff will be able to meet the needs of individuals with disabilities to be sure that such individuals receive quality education programs.

Approved Policy #6. A transitional planning component will be added to the IEP process to ensure that necessary planning is conducted for students with disabilities transitioning to postsecondary education or employment. Mechanisms will be established to enable students with disabilities who have not been identified as educationally handicapped to benefit from transitional planning.

> **Desired Outcome:** Students with disabilities will succeed in postsecondary education or employment opportunities as a result of coordinated preparation.

Approved Policy #7. The Department will promote the development of local interagency councils to identify and resolve issues related to transitional planning for students with disabilities.

> **Desired Outcome:** All resources within the community will be fully utilized in the planning and development of programs and services for students with disabilities.

Approved Policy #8. The Department will work with universities and colleges to enhance the availability and quality of supplemental services through technical assistance and in-service education for faculty on issues related to students with disabilities. The Department will seek funding as necessary.

Desired Outcome: Support services will be available at colleges and universities to enable individuals with disabilities to complete a program.

Approved Policy #9. The Department will work with providers of adult and continuing education programs to train staff, modify curriculum and instruction and identify adults who have not previously received special services. The Department will seek funding as necessary.

Desired Outcome: Support services will be available in adult educational programs to enable individuals with disabilities to successfully complete the program and enter the work force.

Approved Policy #10. Quality and availability of education as it relates to preparing individuals with disabilities for employment will be improved. This will include providing access to appropriate occupational education programs based upon the employment opportunities that will exist in the 21st century.

Desired Outcome: Individuals with disabilities will become active participants in the labor force.

Implementing Policy Recommendations

The Office of Vocational and Educational Services for Individuals with Disabilities (VESID) will coordinate: the development and delivery of the actions to implement the ten policies, development of sections in the VESID manual on implementing these policies, development of operational procedures to implement the policies, establishment of regional linkage activities and implementation of an evaluation plan. These activities are described below:

VESID Manual: VESID will develop a section in the VR Manual for consumer services which will consist of the guidelines, policies, and procedures specifically related to the delivery of transitional services for individuals with disabilities for vocational rehabilitation counselors. This policy section will provide specific direction to VESID counselors and District Offices for increased access for students in the transition from school to postsecondary options and opportunities.

Establishment of Regional Linkage Activities: VESID will establish regional linkage activities to facilitate the implementation of the Regents Policies to Link Services for Individuals with Disabilities. The major activities will include:

- coordinating parent training and developing parent networks;
- providing ongoing information to local CSEs regarding employment opportunities, adult programs and services;
- providing technical assistance for transitional planning; and
- coordinating planning between VESID and community-based transitional programs.

Operational Procedures: In collaboration with other program offices in the Department, a tabulated operational procedures manual to implement the policies for linking services for individuals with disabilities will be developed. The procedures will include standards, effective practices and resources for each program office of the Department. Technical assistance and training will be based on the standards identified in the operational procedures.

Evaluation: The evaluation component was developed to ensure that the implementation of this plan for linking services is monitored and that the benefits of linking services are assessed. The evaluation process will occur in two phases:

> Phase 1. The anticipated outcomes for the implementation of each policy will be evaluated.
>
> Phase 2. The overall impact of the systemic change addressed through the implementation of the ten policies will be evaluated over a period of time that will allow for an adequate assessment. The direct benefits to consumers throughout the State will be a major component of the evaluation in Phase 2.

Implementation in New York City

During 1990, a Vocational Focus Group was convened in New York City consisting of members of the Board of Regents, the State Education Department (VESID and Office for Special Education Services), the New York City Public Schools, and New York Working. This Vocational Focus Group developed a Working Paper which established goals, objectives and activities to link services for the successful transition of New York City students with disabilities from secondary schools to postsecondary education programs, employment and independence in their communities. The proposed linkages were identified through collaborative efforts among offices of the New York State Education Department and units serving individuals with disabilities within the New York City Board of Education.

This Working Paper focuses on students with disabilities who are receiving special education services and students with disabilities who have not been identified as needing special education in the schools. To meet this general purpose, four major goals were established:

1. Increase access to vocational education programs and enhance programming for transitional needs and education beyond school in adult and continuing education programs, colleges, and universities.
2. Develop and expand mechanisms to coordinate existing information and databases for the purpose of linking resources and disseminating data for program development (addressing confidentiality as appropriate).
3. Coordinate resources and services provided by public and private agencies, providers, and community-based organizations to enhance the provision of transition services to individuals with disabilities in New York City.
4. Increase opportunities for employment options and successful job placement in the work force.

Outcomes of the Working Paper will directly benefit individuals with disabilities in New York City. Data will be collected in accordance with each of the objectives and activities to demonstrate their impact on individuals in transitional programs, adult and continuing education, higher education and employment. The Vocational Focus Group will facilitate the implementation of the Working Paper's goals and objectives, review and assess the progress of the activities described in the Working Paper and produce a report on accomplishments that result from the activities described in the Working Paper.

The first activity undertaken to implement the objectives of the Working Paper was the "Partnerships in Transition-A Working Session" which was held in New York City on January 9, 1991. During this session, working discussions were held regarding the policies for linking services, the goals of the Working Paper, transitional activities provided by agencies and providers, networks of resources within boroughs, exemplary programs and models, and follow-up activities.

ATTACHMENT 1.7A: DESCRIPTION OF QUALITY, SCOPE AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES

New York State, through joint action by the Governor and the Board of Regents and in response to recommendations by the State Interagency Council for Vocational Rehabilitation, has moved to improve the State's delivery system for supported employment by establishing clear roles and responsibilities for this vocational service. The intent is to assign responsibilities in a manner which capitalizes on the strengths of particular agencies. To that end, the Office of Vocational and Educational Services for Individuals with Disabilities (VESID) has been designated as having the primary responsibility for program development and administration of supported employment.

This responsibility includes the administration of the Title VIc supported employment programs for the blind, previously administered by the State Commission for the Blind and Visually Handicapped (CBVH), under the jurisdiction of the Department of Social Services. CBVH will continue to determine eligibility and place legally blind individuals into these programs, but program development and administration will be assumed by VESID. Parameters for this change in responsibilities are established in an Interagency Memorandum of Understanding between the State Education Department and the State Department of Social Services. The supported employment system developed in New York State provides employment in integrated work settings in the community as a vocational service option for individuals with severe disabilities.

Job Coach Selection Criteria

This system will require an estimated 200 program vendors and the recruitment of up to 800 skilled job coaches to be available to deliver services. The core of services provided is job coaching and includes all services necessary to assist the person with:

- learning specific work duties and performance standards;
- learning formal and informal site-related expectations about adjustment (e.g., time and attendance, dress, communication protocol);
- acquiring site-appropriate work-related behaviors when dealing with supervisors and coworkers;
- acquiring the sense of belonging to the work force;

- understanding and using the benefits of employment (e.g., spending pay, using leave, participation in employee programs, working under direction from the supervisor and socializing with coworkers); and

- developing a community support system that accommodates and positively reinforces the employee's role as a worker.

Transfer of Supported Employment Programs

In anticipation of the transfer of the intensive phase of supported employment programs from the Office of Mental Retardation and Developmental Disabilities (OMRDD) and CBVH to VESID, and the development of a plan to integrate the Office of Mental Health's (OMH) special employment programs, a Request for Proposal was disseminated to facilities to initiate or expand supported employment programs. Specific emphasis was placed on submissions addressing creative and innovative approaches which assist unserved or underserved individuals with severe disabilities, and which provide programs and services:

- for populations who may be appropriately transitioned from sheltered employment, day training, day treatment and continuing treatment to integrated employment settings;

- which serve pupils with handicapping conditions in secondary special education programs and/or pupils exiting such programs; and

- with emphasis on outreach to individuals with disabilities from minority groups.

The legislative intent of the State supported employment initiative is to develop, promote and strengthen the delivery of coordinated statewide services to individuals with severe disabilities. Priority categories were developed cooperatively among VESID and CBVH, the Office for Special Education Services (OSES), OMRDD and OMH. Specific priority emphasis is placed on programs which address creative and innovative approaches to assisting unserved or underserved individuals with severe disabilities in the following categories:

- mentally ill, including mentally ill chemical abusers

- mentally retarded

- developmentally disabled, including such individuals at risk with the criminal justice system

- autistic
- traumatically brain injured
- learning disabled
- sensory impaired, including deaf and legally blind
- severely physically disabled
- individuals designated as dual-diagnosed
- individuals aging-out of special education programs
- legally blind

Program Standards

Service quality standards were established through program guidelines. Each project is required to complete quarterly reports in a format specified by VESID. Agencies have committed to submit the required reports within given timeframes. In addition, on site reviews may be conducted by VESID to ensure compliance with the project proposal. Specific staff members who will be responsible for completion of the VESID reports and coordination of site visits have been identified. Disseminating information via conferences, newsletters, reports and through the media will permit comment on the service. Interagency planning activities will provide for a review of data and recommendations for possible changes in program standards.

At the present time, all supported employment programs funded by VESID are required to be explicitly designed to serve those persons who, by the nature of their vocational handicap, require the availability of intense and ongoing job related services, advocacy on their behalf with employers, coworkers and families to ease their integration into the work force, and the availability of extended services over an unlimited period of time.

Integration of persons with severe disabilities into a work force of nondisabled persons must be emphasized and should include: job placement; job site training for productivity and for interaction with nondisabled coworkers; ongoing assessment; and follow-up. Service to employers should be arranged as needed, including coworker training and job site modification. Extended services, including ongoing support for job coaches, case managers and other support services, will be provided by OMH, OMRDD and other resources, including a VESID-administered State extended services fund for supported employment.

Federal Title VIc funds for supported employment programs are primarily used to develop model programs and closely monitored field trials of supported employment services to determine which procedures and methods are most effective, and which modifications or new methods work best with different populations. The successful experience of model programs will be disseminated through conferences, newsletters and field contacts. Emphasis is on developing methods to extend supported employment opportunities to underserved groups such as the chronically mentally ill, traumatically brain injured, severely mobility impaired or communication disability, severely learning disabled and the multiply disabled. Projects for supported employment programs provide:

- assessments of worker skills and placement issues;
- job development;
- matching of prospective workers with jobs and coaches;
- situational assessments;
- intensive job site training;
- related counseling and advocacy services; and
- extended follow-up services to reinforce and maintain employment. The VESID counselor monitors the individual's progress through the sequence of services and advocates for necessary changes in approach by project staff.

The VESID counselor closes the case when the job placement appears stabilized at the lowest appropriate level of intervention necessary to maintain employment and arranges for provider responsibility to continue the job retention services. When the consumer requires the presence of a job coach at the site 20 percent or less of the working hours, counselors determine if closure is appropriate with the provider and consumer.

Activities and Accomplishments to Date

The 1990 appropriation provided for VESID to expand its administrative responsibility for intensive service contracts consistent with the direction provided by the State Interagency Council for Vocational Rehabilitation. This entailed extensive interagency planning as well as statewide training of providers and staff. Outcomes related to this planning for restructuring the system have included:

- Establishment of clear roles and responsibilities for VESID and OMRDD's joint delivery of supported employment services, including streamlining the fiscal planning and service delivery system by clearly establishing VESID as the sole State fund source for intensive services and OMRDD as the sole fund source for extended services for people having developmental disabilities. VESID and OMRDD have entered into a Memorandum of Understanding that defines the parameters of agency responsibilities.

- Development of a separate agreement between VESID and DSS-CBVH to transfer Federal Title VIc contract administration responsibilities to VESID. This transfer will enhance the ability to standardize service definitions, monitoring and fiscal planning. While funds will be administered by VESID, individualized case planning will continue to be the responsibility of CBVH.

- Continued development, targeted for implementation in the fall 1991, through an agreement between VESID and OMH to more clearly define mutual roles and funding responsibilities for consumers who have mental illness. This process will include the development of five OMH/VESID Systems Integration Programs in different locations throughout New York State.

- Implementation in April 1990 of the first unified Request for Proposal (RFP) on Supported Employment, resulting in 92 additional contracts for services to a projected 738 people. These services were initiated October 1, 1990. This interagency RFP consolidates the application process for providers, thus streamlining interagency selection processes, and develops a more coordinated mechanism for planning. Under the previous system, provider agencies receiving awards would have had to package two or more contracts from various sources in order to obtain adequate funding to deliver services. Such providers will receive one contract consolidating the operational budget.

- Working toward reduction of provider administrative burdens by establishing uniform fiscal and program reporting procedures, using a common format acceptable to all participating agencies.

- Conducting interagency training sessions for staff of VESID, OMRDD, CBVH and sessions for providers to assure the effectiveness of this effort. Over 300 individuals attended the latter sessions. In addition, VESID provided training to over 400 VESID counselors and to district office management staff regarding their role in the restructured system.

Summary of Impact on Consumers and Providers

From State Fiscal Year 1988-89 through the end of SFY 1990-91, the State resources invested in the VESID supported employment initiative will have resulted in the following:

State Fiscal Year	**1988-89**	**1989-90**	**1990-91 Projected**
1. Provider Awards	48	104	247
2. Consumers Served in Employment	288	1,210	1,517*
3. Consumers Served through Benefits/ Advocacy	NA	305	490*
4. Coaches Trained	150	289	578*

* Includes 1/2 year projections relating to October 1990 RFP.

Supported Employment Data

VESID, through the Supported Employment Management Information System (SEMIS), has been collecting data on individuals with disabilities in supported employment programs for the past three years. The data collected through the SEMIS project will become available in the fall of 1991. This data will give information on consumer characteristics, earnings and benefits, integration levels, consumer and employer satisfaction and a comprehensive cost benefit analysis of supported employment service delivery by consumer populations and models of service.

This research oriented data system will be replaced by the Supported Employment Interagency Reporting and Monitoring System. This interagency system will integrate data from OMRDD, CBVH and VESID. Information collected on each individual will include:

- hours of screening and assessment;
- hours of job development/placement;
- hours of on-site instruction;
- hours of service provided;
- extended services funding source; and
- average weekly work hours and wages paid.

Information gathered on each supported employment program will include:

- current staff vacancies;
- staff training provided;
- program obstacles encountered;
- major accomplishments and achievements; and
- technical assistance required.

ATTACHMENT 1.8A: STATE'S GOALS AND PLANS REGARDING DISTRIBUTION OF FUNDS RECEIVED UNDER TITLE VI, PART C

Title VIc funds have been used to extend supported employment services to individuals who could not readily be served under the traditional Title I service delivery system. The successful approaches developed under Title VIc resources have since been incorporated in the design of other service programs funded with Title I or with additional State funds. Title VIc resources do not provide sufficient funds to create additional new programs. At this point in time, Title VIc funds represent 14 percent of the total funds being used for intensive placement and training. Plans for 1991-92 will concentrate on the continuing operation of the projects established by VESID under VIc auspices.

It is anticipated that increased efficiency will result in 397 placements out of the 518 people expected to be served during the upcoming 12 month period in those 30 model programs established in 1988 by VESID. An additional 46 placements are expected from the 46 people served in 8 programs funded by the Commission for the Blind and Visually Handicapped share of the State's VIc appropriation and whose contract administration was transferred to VESID in April 1990 by a Memorandum of Understanding (MOU). Program evaluation will continue with reviews of statistical data and anecdotal experiences described in the unified interagency quarterly report submissions. Successful and exemplary practices will be disseminated to staff of the State agencies involved and to other project sites.

Each of VESID's 30 model Title VIc programs are designed to:

o Extend services to individuals with severe disabilities who might not be traditionally considered appropriate for competitive employment.

o Develop techniques for unserved and underserved populations such as traumatic brain injury, deafness, multiple disabilities, autism, severe learning disability, and mental illness, etc.

o Develop programs having service delivery experience that could be sufficiently documented to address policy decisions.

o Develop quality programs that could be used for replication purposes.

o Establish successful supported employment programs that will provide technical assistance to future similar programs.

Current providers were originally selected through an interagency competitive Request for Proposal (RFP) issued in the fall 1987 through processes described in earlier Plan submissions. Final selection from among the top scoring agencies were balanced on a statewide basis regarding diversity of populations, diversity of geographic location, and model or approach used. Since Title VIc funds are insufficient to maintain services at all 30 original sites, Section 110 funds now provide the resources needed to continue at 14 of the 30 sites. It is not expected that additional programs can be selected for funding by Title VIc. Should substantial increases in Title VIc make new program creation possible between 1991 and 1994, the State's interagency competitive RFP process would be used.

Title VIc funds are expended at each program site through multiple year contracts, under which performance and costs are reviewed at least annually. Each budget is related to the accomplishment of planned outcomes coordinated with District Office case management priorities. Enabling programs to hire job coaching personnel on a salary basis has led to improved continuity of service to consumers through stable, permanent staffing and continuous supervisory direction. In addition to enhancing stability of new programs, there is also greater flexibility to serve nontraditional populations of individuals with more severe disabilities. Under this system, hours of service intervention are limited by the total resources at a site rather than by an inflexible number of hours per person. The durational limit is the Federal 18 month limit which is counted from the first day of job site placement.

VESID counselors perform case management duties for each Title VIc consumer, including developing the Individualized Written Rehabilitation Plan (IWRP) and monitoring its implementation. Since the programs funded under Title VIc represent totally new services, every effort is made to improve the project's performance through continuing technical assistance or program design improvements.

The following chart summarizes VESID's current level of Federal expenditure in supported employment, the number of programs and individuals served, disabilities served in programs and types of supported employment models.

Federal Resources for Supported Employment

Funding Source	Number of Programs	Consumers Served	Types of Disabilities	Models
Title VIc VESID Contracted	16	276	developmental disabilities, severe mental illness, traumatic brain injury, autism, severe physical disabilities	individual enclave mobile crew
Title VIc CBVH Contracted	8	46	blind, deaf blind, developmental disabilities	individual enclave mobile crew
Section 110 Contracted to continue VIc Models	14	242	developmental disabilities, severe mental illness, traumatic brain injury, severe physical disabilities, deafness	individual enclave mobile crew
Section 110 Traditional Unit Rate Authorizations	multiple	estimated 300	developmental disabilities, severe mental illness, traumatic brain injury, deafness, severe physical disabilities	individual enclave

Attachment 1.8A
Page 3 of 3 pages
Effective Date: October 1, 1991

ATTACHMENT 1.10A: DEMONSTRATION OF EVIDENCE OF COLLABORATION BY AND FUNDING FROM RELEVANT STATE AGENCIES AND PRIVATE NONPROFIT ORGANIZATIONS FOR ONGOING SUPPORTED EMPLOYMENT SERVICES

From its inception in the State Fiscal Year 1988-89, the implementation of activities, programs and services related to the State supported employment appropriation provided to VESID has reflected interagency cooperation and commitment, highlighted by the development of a multiagency Memorandum of Understanding. This interagency agreement which is among the Office of Mental Retardation and Developmental Disabilities (OMRDD), the Department of Social Services Commission for the Blind and Visually Handicapped (CBVH), the Office of Mental Health (OMH), and the Education Department Office of Vocational and Educational Services for Individuals with Disabilities (VESID), is the cornerstone of efforts to develop and enhance models of supported employment across New York State.

During this reporting period, the supported employment initiative has been significantly advanced by the 1989 reorganization of VESID and the creation of the State Interagency Council for Vocational Rehabilitation. These events and the continued commitment and partnership of consumers, providers, advocates and State agencies have created a constructive climate characterized by significant systems change and intergovernmental administrative support. The Interagency Council, established pursuant to a Memorandum of Agreement between the Governor and the Board of Regents, initiated activities that have resulted in expediting the accomplishments of many of the goals outlined in the Memorandum of Understanding on Supported Employment and paved the way for further systems improvements.

Administration of these resources for program establishment and services has involved interagency communication at the State and local levels, joint policy development, mutual program planning and selection and funding of underserved and unserved populations.

Purpose of the State Appropriation

The VESID State appropriation was created in order to establish the viability of supported employment services in relation to State needs as determined by consumers and families, providers and State agencies. To assure that interagency relationships are developed in support of the emerging service delivery system, an annually revised four-agency Memorandum of Understanding regarding Supported Employment is required. In 1990, the purpose of the State appropriation was to transfer the responsibilities and resources for administration of supported employment services from OMRDD to VESID for OMRDD and eligible people. Mandated activities to be implemented with the State appropriations include:

- Creating services for underserved groups such as youth with severe disabilities, people with physical, developmental, emotional or learning disabilities and others with severe disabilities.
- Establishing a viable provider system through retraining VESID staff or creating new positions for integrated employment specialists.
- Achieving equitable inclusion for underrepresented persons through funding the extended services component of supported employment for non-OMRDD and non-OMH eligible individuals.
- Maintaining and expanding the supported employment initiative begun by OMRDD for mutually eligible consumers.

Activities and Accomplishments to Date

In order to establish the necessary structure and climate for change, the 1990 appropriation provided for the expansion of VESID's administrative responsibility to provide intensive service contracts consistent with the direction provided by the State Interagency Council for Vocational Rehabilitation. This has entailed extensive interagency planning as well as statewide training of providers and VESID staff. Efforts at restructuring the system include:

- Establishment of clear roles and responsibilities for VESID and OMRDD's joint delivery of supported employment services. This includes streamlining the fiscal planning and service delivery systems by establishing VESID as the sole State fund source for intensive services and OMRDD as the sole fund source for extended services for people having developmental disabilities. VESID and OMRDD have entered into a Memorandum of Understanding that defines the parameters of agency responsibilities.
- Development of a separate agreement between VESID and DSS-CBVH to transfer CBVH's Federal Title VIc contract administration responsibilities to VESID. This will enhance the ability to standardize service definitions, monitoring and fiscal planning. While funds will be administered by VESID, individualized case planning will continue to involve CBVH counselors knowledgeable about these consumers' needs.

- Continued development of an agreement between VESID and OMH to more clearly define mutual roles and funding responsibilities for consumers who have mental illness.
- Implementation of the first unified Request for Proposal (RFP) on Supported Employment in April 1990. This RFP resulted in 92 additional contracts for services initiated October 1, 1990. This interagency RFP consolidated the number of different agencies issuing RFPs, thus simplifying the application process for supported employment providers, streamlining interagency selection processes and developing a more coordinated mechanism for planning. Under the previous system, provider agencies receiving awards would have had to package two or more contracts from various sources in order to obtain adequate funding to deliver services. Now providers will receive one contract consolidating the operational budget.
- Establishment of uniform fiscal and programmatic reporting procedures, using a common format acceptable to all participating agencies.

The expected results of this restructuring will be the enhanced planning ability for resources required for the supported employment service system, consolidated monitoring and data analysis and enhanced service delivery. The administration of supported employment services will be easier for providers.

To assure the effectiveness of this effort, VESID, OMRDD and CBVH have conducted interagency training sessions for agency staff as well as for providers. Over 300 individuals attended the provider training sessions. In addition, VESID provided training to over 400 VESID counselors and to district office management staff regarding their role in the new system.

Summary of Impact on Consumers and Providers

From State Fiscal Year (SFY) 1988-89 through the end of SFY 1990-91, the State resources invested in the VESID supported work initiative will have resulted in the following:

- 3,015 consumers receiving employment services that include planning, counseling, assessment, job development, intensive job-site training or extended job retention training;
- 795 consumers and family members receiving benefits education or advocacy services;

- 316 provider awards being distributed to establish programs and services; and
- 1,017 direct service personnel, such as job coaches and job coaching supervisors, being trained.

The summary of the revisions within the 1990 Memorandum of Understanding on Supported Employment is as follows:

- Incorporates system changes such as VESID's designated role as the lead agency for developing and administering the intensive component of supported employment programs.
- Includes changes resulting from separate agreements signed between VESID and OMRDD and between VESID and DSS-CBVH, transferring certain contracts and responsibilities to VESID.
- Consolidates language and streamlines concepts.
- Emphasizes joint fiscal and program planning.
- Anticipates a new relationship between OMH and VESID.
- Reiterates key service definitions in use across all four agencies' programs.

A copy of the Memorandum of Interagency Understanding Regarding Supported Employment is in Attachment I. Specific memoranda with OMRDD (Attachment II) and CBVH (Attachment III) which provide the details of individual agreements with VESID and go beyond the scope of the multiagency memorandum have been developed.

Meeting Unmet Needs

Pursuant to the recommendations of the State Interagency Council for Vocational Rehabilitation, VESID has assumed the role as lead planning agency for the continuing development of supported employment services in the State. In association with consumer groups, families, providers and other State agencies, it has been determined that there is a continuing need for expansion of services to address unmet needs in the State for supported employment opportunities. OMRDD has requested that in SFY 1991-92, VESID provide for at least 400 additional slots needed to achieve service planning targets over the next five years. People with severe and persistent mental illness are represented only in limited proportion to the need for services. Thus, VESID and OMH will be seeking sufficient resources for expansion of services to an additional 600 persons. Funds are also necessary to continue to expand opportunities for youth with severe disabilities who are in need of a wide variety of in-school and out-of-school work experiences to foster successful transitions to adult working roles through supported employment. Additional services continue to be needed for people with severe physical and learning disabilities, sensory disabilities and traumatic brain injury.

MEMORANDUM OF INTERAGENCY UNDERSTANDING
REGARDING
SUPPORTED EMPLOYMENT

PARTIES TO THIS AGREEMENT

The parties to this agreement are the:

- New York State Education Department
  Office of Vocational and Educational Services
  for Individuals with Disabilities (VESID)
- New York State Department of Social Services
  Commission for the Blind and Visually Handicapped (CBVH)
- New York State Office of Mental Retardation
  and Developmental Disabilities (OMRDD)
- New York State Office of Mental Health (OMH)

PURPOSES OF THIS MEMORANDUM OF UNDERSTANDING

In recognition of the need for a coordinated and integrated statewide approach toward supported employment, the parties to this agreement will pursue a cooperative process whereby services to New York State consumers with severe disabilities are assured. The State Interagency Council for Vocational Rehabilitation (IAC) has developed principles for the provision of vocational rehabilitation services and employment for persons with disabilities. These principles have been incorporated in this agreement and will govern New York State's interagency supported employment programs in realizing the following broadly based objectives.

A. Continue to develop, enhance and expand supported employment for persons with severe disabilities. The State system for the provision of supported employment will reflect: mutually agreeable definitions of the services to be provided; administrative responsibility of the intensive component of supported employment services to eligible individuals as the responsibility of the Office of Vocational and Educational Services for Individuals with Disabilities, in cooperation with the Commission for the Blind and Visually Handicapped for persons who are legally blind; administrative responsibility of the extended services component as the responsibility of the Office of Mental Retardation/Developmental Disabilities for individuals with mental retardation or developmental disabilities, and VESID for individuals with disabilities who are not eligible for services through OMRDD and OMH.

A similar division of administrative responsibility for extended services is currently under consideration with OMH for persons with severe and persistent mental illness.

B. Establish a process that will improve the statewide management of supported employment programs by avoiding duplication of effort and funding, while assuring accountability. This process will provide for a coordinated system of program development for supported employment services, including the coordination of a statewide planning and request for proposal process, coordination of programmatic and fiscal responsibilities prior to program start up, and promotion of consistency in funding, reporting and monitoring.

C. Maximize the quality of service delivery ensuring a comprehensive, continuous, efficient and effective referral process, individual program planning, coordination of intensive vocational services with extended services, and information collection, information dissemination and technical assistance.

D. Identify issues, policies and practices that present systemic barriers to effective participation of individuals with severe disabilities and develop appropriate resolutions to remove such barriers.

E. Establish a planning process, consistent with the directions of the State Interagency Council for Vocational Rehabilitation, for budget coordination which defines and projects the numbers of people in need of intensive and extended services for each fiscal year in order to facilitate program and fiscal planning.

USES AND TARGET AUDIENCE

This document, its appendices and subsequent revisions, shall be referenced by the parties to this agreement to guide their understanding of the connections and expected roles which are being developed with regard to supported employment. While the document describes policies and procedures of each agency regarding collaboration on supported employment, it does not attempt to describe all the policies and procedures of each agency. The document is not designed to limit the involvement of each agency, but to emphasize how the participating agencies may work together on critical issues necessary for the coordinated implementation of supported employment across the State.

As the State agencies delivering supported employment services, VESID, CBVH, OMRDD and OMH have entered into this agreement to coordinate and integrate supported employment programs statewide for all individuals with disabilities. Consumers served by other public agencies that are not part of this Memorandum of

Understanding (MOU) will have access to supported employment services through VESID and CBVH.

RESPONSIBILITIES OF PARTICIPATING AGENCIES

To accomplish the purposes previously described, the parties to the Memorandum of Understanding will abide by the agreed upon components of supported employment within the primary areas of: interagency planning and coordination, eligibility, service delivery to consumers, program development and coordination, and fiscal responsibilities.

A: INTERAGENCY PLANNING AND COORDINATION

Since the State supported employment initiative includes people in all disability groups and at different levels of participation, it is incumbent upon the State agencies responsible for such services to work together to ensure that efforts are coordinated, effectively managed and responsive to the needs of consumers. State programs should build upon the related Federal initiative to expand and enhance supported employment options available to people with severe disabilities.

Central administrative staff of MOU participants who are responsible for directing supported employment services will meet at least quarterly. All participating agencies will develop refined service definitions and procedures and share such information as may be required to enable the agencies to mutually develop and review policies, coordinate and prioritize activities, and plan budgets and appropriate fiscal support. Among these mutual development activities will be a coordinated statewide request for proposal (RFP) process for supported employment programs and ongoing exchange of information necessary for program coordination.

Any RFP issued by any of the State agencies for the development of supported employment programs will reflect the input and planning of each of the other appropriate involved State agencies. Furthermore, regional and local meetings shall be conducted by the State agencies in order to define and develop strategies to deal with the impact of the supported employment initiatives on local communities. These meetings should involve regional and district State agency staff, county or municipal government officials, and local education agencies who are in a position to speak about operational concerns, as well as providers and consumers or their representatives.

B. ELIGIBILITY

The terms of this MOU relate to providing services to people who are mutually eligible for supported employment services from any of the participating agencies. Each of the parties to this agreement will facilitate the involvement of eligible individuals in supported employment. Access to these services may occur through self-referral, or referral by state or community agencies.

C. SERVICE DELIVERY TO CONSUMERS:

Supported employment services consist of intensive time-limited vocational rehabilitation services (the responsibility of VESID and CBVH) and prevocational and extended services, including vocational supports, for the duration of the supported employment placement (the role of OMRDD, OMH, and VESID for those individuals with disabilities who are not eligible for services through OMRDD and OMH). The State agencies will work cooperatively to ensure that services and funding are provided appropriate to the needs of consumers and in keeping with Federal and State regulations and policy.

Through the case service process for eligible individuals, and consistent with the State Education Department and Department of Social Services, "Memorandum of Understanding Regarding Supported Employment", VESID and CBVH will coordinate and authorize fees for service and/or contracts and oversee the intensive vocational service period. The objective of the intensive vocational service segment is to stabilize the supported employment placement to the individual's and employer's satisfaction and to transition the individual to a comprehensive plan of extended services. The purpose of extended services provided by OMRDD/OMH/VESID is to maintain the individual in supported employment. The nature of the services provided during the intensive and extended services components of supported employment is basically the same; the difference is in the level of service provided.

Allowances would be made for persons who, while receiving extended services, require reintervention of intensive services through VESID/CBVH because they have destabilized on the job. The basis for deciding the need for reintervention will be based on the judgment of the VESID/CBVH counselor in assessing indicators of destabilization, rather then the elapse of a minimum amount of time. Under these circumstances, VESID/CBVH shall again assume the responsibility and cost of providing intensive vocational services, including necessary job related support services such as travel training or transportation.

D. PROGRAM DEVELOPMENT AND COORDINATION

Program development and coordination activities will be collaboratively carried out to avoid duplication of effort and to assure services which are mutually acceptable to the participating agencies. VESID and CBVH staff will work with OMH and OMRDD staff and local government and education agencies, as appropriate, in coordinating, reviewing and evaluating community based supported employment program proposals. All MOU agencies will thereby link supported employment program development and delivery of services.

Interagency cooperation and program development will involve the mutual development of regional and district work plans by State agency staff. This should include specific attention to: (a) developing local conflict-resolution mechanisms when questions concerning consumer eligibility or service provision arise; (b) assisting each State agency's supported employment program providers to achieve status as vendors of services to the other parties to the MOU; (c) obtaining input on program development from local consumer and advocacy groups; and (d) cooperating in job developing and marketing, providing program technical assistance and the cross-training of State agency field staff.

Technical assistance and training will be available to projects established by any of the four MOU agencies. Collaborative planning of additional in-service training initiatives will also occur on an interagency basis, in order to make training opportunities as widely available as possible for provider and State agency staffs responsible for delivering supported employment services.

Other cooperative activities will include collaboration in collecting and analyzing data which document programmatic and individual outcomes in different types of supported/special employment programs.

E. FISCAL RESPONSIBILITIES

VESID and CBVH provide funding for the intensive vocational rehabilitation services for individuals in supported employment. An assessment of the individual's rehabilitation potential must be conducted and an Individual Written Rehabilitation Plan (IWRP) prepared. The phrase "intensive vocational rehabilitation" is used as a means of clarifying the appropriate point of entry for VESID/CBVH funding support. Consistent with this Memorandum of Understanding and Interagency Agreements between VESID and both CBVH and OMRDD, as of April 1, 1990, VESID has responsibility for contracting for intensive services using both Federal Rehabilitation Act funds and State appropriations for supported employment for individuals with severe disabilities served by OMRDD and CBVH. This includes individuals who are legally blind. VESID will develop contracts and assume sole administrative, monitoring and programmatic responsibility for all funds appropriated for supported employment intensive services and/or other integrated employment options related to supported employment for individuals with severe disabilities served by OMRDD and CBVH, including those who are legally blind. CBVH is responsible for client-specific case management for all individuals who are legally blind and in supported employment, regardless of which vocational agency is the contractor.

All MOU participants are responsible for arranging, with respective parties to this agreement, the vocational and other support services and the resumption of intensive vocational rehabilitation services as may be required to preserve employment of mutual constituents. Interagency planning will emphasize collaboration on using existing resources to the maximum extent possible for the provision of extended services to individuals with severe disabilities.

For individuals whose disability is not within the province of OMH or OMRDD, VESID/CBVH will make every effort to secure funding for extended services, including services through the State Education Department's supported employment appropriation. No individual will be denied supported employment services on the basis of disability alone.

For funding of OMRDD-eligible people with developmental disabilities, extended services is available under the auspice of the OMRDD supported employment program. Provision of funding for extended services of mutually eligible VESID/CBVH and OMRDD consumers is contingent upon available resources and interagency planning activities which make service delivery needs known during the Request for Proposal process and other points during the year. Within these constraints, OMRDD will provide funding to people with developmental disabilities who enter supported employment after receiving VESID/CBVH intensive services.

After stabilization into the supported employment placement, OMRDD shall bear fiscal responsibility for the costs of extended services, except when the VESID/CBVH counselor determines that the individual has destabilized on the job, as previously noted.

Funding for OMH eligible individuals is currently available through two avenues. In one, OMH provides funding for both intensive and extended care services through 50 special employment programs at 100 percent of their net operating costs. In addition, VESID provides intensive service dollars to those supported employment programs, serving persons with mental illness who have access to extended care services through other sources.

To improve upon these current mechanisms for funding supported employment services for persons with mental illness, OMH and VESID are developing a program integration plan. With input from consumers, providers and families, the intent of the plan is to define more precisely how the financial and service resources of each agency will be blended to better support existing programs and to develop new supported employment opportunities. The particulars of this plan including each agencies mechanism for funding or providing intensive and extended care services to persons with mental illness will be described. The plan will be available in the fall of 1990. All new program development efforts resulting from the plan will, of course, be dependent upon available resources.

RELATIONSHIP TO PREVIOUS AGREEMENTS

This agreement replaces all prior Memoranda of Understanding on Supported Employment but does not replace other State agency agreements which are in effect. It simply clarifies and extends collaborative efforts among the agencies specifically in regard to supported employment initiatives.

MODIFICATION OF AGREEMENT

This agreement is subject to modification at the request of any of the MOU participants. Such modifications will be reviewed and mutually agreed upon at interagency meetings and effective immediately upon the signatures of all of the participating agency chief executives.

SIGNATURES

Thomas Sobol
Thomas Sobol, Commissioner
NYS Education Department

9/27/90
Date

Cesar Perales, Commissioner
NYS Department of Social Services

9/28/90
Date

Elin Howe
Elin Howe, Commissioner
Office of Mental Retardation and
Developmental Disabilities

9/28/90
Date

Richard C. Surles, Commissioner
Office of Mental Health

9-27-90
Date

APPENDIX A

GENERAL DEFINITIONS

For purposes of this Memorandum of Understanding, and consistent with federal definitions, the following definitions of operational terms apply to state interagency uses:

Supported Employment

The term "supported employment" refers to paid competitive work performed by people with severe disabilities who are working in integrated community-based jobs which are a part of the regular labor market and who must be sustained in their continued employment by ongoing support and job site intervention. The models used include individually assisted employment and group assisted employment.

- "Paid Competitive work" means work that is performed on a full-time or a part-time basis, averaging at least 20 hours per week for each pay period, and for which the individual is compensated in accordance with the Federal Fair Labor Standards Act and NYS Wage and Hour Regulations. Paid competitive employment also includes transitional employment for individuals with chronic mental illness.

- A "person with severe disabilities" is a person for whom competitive employment has either not traditionally occurred or has been interrupted or intermittent as a result of having a permanent and substantially handicapping physical or mental condition.

- An "integrated" work setting is a job site either:

    i) where most employees at the site do not have disabilities and the supported employee is not part of a work group containing other co-workers with disabilities; or,

    ii) where most employees at the site do not have disabilities but the supported employee is assigned to a work group containing other people with disabilities; there are no more than eight persons with disabilities in that work group and there are frequent opportunities for regular interaction with either co-workers or other persons in the immediate work setting none of whom have disabilities, other then personnel providing support services.

Extended services

The term "Extended services" refers to planned interventions required to enable the supported person to remain effectively employed in the integrated community labor market once the intensive job site training phase ends. The supported employee shall receive continuing or periodic skill training services provided at least twice monthly at the work site throughout the term of employment to enable the individual to perform the work.

Extended services may also include "other support services" provided at or away from the work site as required to enhance or maintain community employability, for example: transportation, personal care services, counseling of the supported employee or of family members, advocacy with public benefit agencies. Under this program initiative, "other support services" can only be provided if skill training services are also needed by the supported employee and provided at the work site.

"Skill training" may address job duty performance, related work behaviors, communication, and interpersonal skills. It includes periodic reassessments of the individual's support needs, so that adjustments in the service package may be made as circumstances require. The only exception to the above definition of extended services applies to individuals with severe and persistent mental illness, who need extended services in order to maintain employment, but not necessarily job skills training at the job site.

Job Coaching

"Job coaching" refers to job-site training of a supported employee by an approved specialist, who uses structured intervention techniques to help the supported employee learn to perform job tasks to the employer's specifications and to learn the interpersonal skills necessary to be accepted as a worker at the job site and in related community contacts. In addition to job-site training, job coaching includes related assessment, job development, counseling, advocacy, travel training, and other services needed to maintain the employment of a supported employee. Examples of applied job coaching techniques include:

- specialized job placement following a thorough task analysis and matching the employment to the interests and strengths of the individual with a disability;
- intensive on-site instruction of the worker, co-workers, and supervisor based on situational assessment;

- continuous evaluations by collecting and recording data and modifying the job-site training as appropriate;
- advocating for the supported employee both at and away from the job; and
- proactive extended services at and away from the job site, as necessary to assist the worker to remain employed in the integrated labor market.

Intensive Vocational Rehabilitation Services

The term "Intensive Vocational Rehabilitation Services" refers to case services required by an individual to become employable within a supported employment placement. These case services are provided by VESID or CBVH either directly or through purchasing from designated community agencies. The services may include but are not limited to:

- evaluation, including situational assessment
- counseling, guidance, and referral to resources
- vocational or other training, including intensive job coaching, adaptive driver training or travel training
- physical/mental restoration
  interpreters, readers, personal care attendants
- transportation
  services to family members
- technological aids or devices
- occupational tools or licenses
- placement in suitable employment

These intensive vocational rehabilitation services lead to an employment level of stabilization, when it is anticipated that the individual will be able to sustain employment with less frequent interventions from the agencies providing extended services.

Intensive Clinical Services

The term "Intensive Clinical Services" includes psychological, psychiatric, occupational therapy, physical therapy, speech therapy, medical services, or clinical social work.

Stabilization

The term "Stabilization" is used when the individual's work performance plateaus, and the job coaching and related interventions such as adjustment counseling and advocacy, have faded to the lowest level necessary to maintain the individual in employment. A general rule of thumb is that stabilization occurs when the intervention level fades to less than twenty percent of the work week for at least three consecutive weeks. When stabilization occurs, the worker is ready to transition from VESID/CBVH intervention to the appropriate source of long-term support. This transition should not occur unless all aspects of the consumer's placement indicate that the employment situation is secure. The VESID/CBVH counselor will determine the need for reintervention of intensive services on the basis of indicators of destabilization that do not focus solely on the elapse of time for persons who, while receiving extended services, become destabilized on the job.

Situational Assessment

The term "Situational Assessment" refers to a comprehensive community oriented assessment of the individual's overall functioning in relation to the specific environment of the supported job, including the job site, the community through which the person must travel to and from the job and the people at the job site such as the coach, coworkers, and supervisor. This may include such components as specific job development, task analysis, consumer and job matching, consumer and coach matching, vocational and social skills assessment, and is primarily used to identify areas for training and to develop the training strategies necessary for employment.

Models of Supported Employment Service

- "Individual Placement" models establish employment opportunities for individuals with severe disabilities in local industries on a one-person/one-job basis. Successful outcomes of this model approximate competitive placement, and often become competitive when, after time, ongoing services are no longer needed. Typically, a trained job coach develops the job in the industry, matches an individual to the job, trains the individual on the job until he or she meets industry criteria and has developed social integration skills. The coach provides extended services to the individual and the employer for as long as such services are required.

- "Enclave" models consist of a small group of approximately five to eight individuals with severe disabilities who work in a local industry with training, supervision and have ongoing support provided by a job coach from a community agency. Supported employment enclaves are distinguished by the continuous, individualized job and integrative social skills training provided to consumers. Enclaves are built slowly, starting with one or two workers, then adding new workers as previous trainees are established with the enclave. There is an opportunity for integration with non-disabled workers at the site, as well as an opportunity for enclave workers to be absorbed into the regular work force as work skills develop.

"Mobile Crew" models are set up as small, single purpose service business whose employees move from site to site in the community rather than operating as an extension of a large organization with many missions. A general manager is responsible for small crews with eight or fewer employees, and there is one supervisor/job coach per crew. Companies using the Mobile Crew model are often organized as not-for-profit corporations, performing such services as cleaning or landscaping. Opportunities for integration are provided through interaction with customers and the general public as mobile crew members perform their work.

"Affirmative Business" models are based in small private subcontractors, retail or manufacturing businesses, which are established to provide employment. An Affirmative Business may be a restaurant or a bakery, for example, providing products or services for public consumption. This model employs a small group of individuals with severe disabilities as well as individuals who do not have disabilities. This provides integration opportunities with co-workers without disabilities, as well as intensive training and supervision at the work site.

"Transitional Employment (TE) for the Mentally Ill" models develop time-limited jobs in integrated settings as an integral part of the consumer's rehabilitation program. Participants are guaranteed access to the TE jobs and typically hold a series of such placements before obtaining the confidence, interpersonal skills, and job references needed to secure and maintain independent employment - a job of choice relevant to one's educational background and job skills. Failure on TE is considered part of the restoration process and individuals are actively encouraged to try again as soon they are ready. The individual's need for orientation and training and the employer's need for training of new TE participants are met by program staff who learn the job before the consumer is placed, train each new worker at the job site, arrange coverage should the worker be absent, and are continually available to both the worker and the employer should any difficulty arise. Support services are provided by staff and other consumers at the job site, at the rehabilitation facility and in other institutional and natural settings. Such supports are on-going in nature and are maintained even after independent employment is achieved. Maintaining such supports provides the individual with immediate access to the rehabilitation program and TE, should there be a recurrence of severe psychiatric symptomatology.

MEMORANDUM OF UNDERSTANDING BETWEEN THE STATE EDUCATION DEPARTMENT AND THE OFFICE OF MENTAL RETARDATION AND DEVELOPMENTAL DISABILITIES REGARDING SUPPORTED WORK PROGRAMS

The New York State Education Department Office of Vocational and Educational Services for Individuals with Disabilities ("VESID") and the Office of Mental Retardation and Developmental Disabilities ("OMRDD") agree to the following allocation of responsibilities regarding the implementation of supported work programs ("Supported Work").

1. This agreement shall be in effect April 1, 1990, and continues unless amended or terminated by mutual agreement. This agreement is contingent upon State appropriation of funds.

2. OMRDD shall maintain its current 1989-90 Supported Work contracts with Supported Work providers as identified in attachment A (the "OMRDD Contracts"), including direct State contracts and those funded through State aid to New York City, terminating December 31, 1990 and June 30, 1991, respectively, at which time VESID will assume all responsibilities with respect to the intensive service component described in the OMRDD contracts, and have in place contracts with Supported Work providers for the intensive service component. The period beginning April 1, 1990, and ending on the latest termination date of the OMRDD Contracts shall be called the "Interim."

3. During the Interim, VESID shall assume responsibility for monitoring the intensive service component of the OMRDD Contracts.

4. In addition to the monitoring responsibilities described in Paragraphs 2 and 3 above, VESID shall execute an RFP in anticipation of contracts effective October 1, 1990, to provide services for an additional 400 developmentally disabled individuals consistent with the budget allocations provided for that purpose.

5. During the Interim, VESID shall perform programmatic monitoring functions of the OMRDD Contracts consistent with current OMRDD requirements. OMRDD shall make available to VESID all reports it receives from providers as well as prototypes of OMRDD program monitoring and expenditure forms. OMRDD shall ensure that VESID has the same authority to make site visits and review and monitor programs as does OMRDD. VESID, with the assistance of OMRDD, may modify such monitoring protocols.

6. During the Interim, in order to effectively monitor the New York City Programs, OMRDD shall assist VESID in working with the New York City Department of Mental Health, Mental Retardation and Alcoholism Services (NYCDMHMRAS) to obtain information necessary to conduct program monitoring.

7. OMRDD shall continue to reimburse providers according to the terms of the OMRDD contracts, except that, with respect to the New York City Contracts, OMRDD shall continue to reimburse New York City in accordance with the terms of the New York City Contracts. VESID shall reimburse OMRDD for all Contract expenditures upon receipt of a quarterly expenditure report from OMRDD. OMRDD shall ensure that VESID receives copies of expenditure reports received by OMRDD upon request from VESID. VESID shall reimburse OMRDD through a journal voucher process, except that VESID's liability for reimbursement shall not exceed the amount of funds appropriated to it for this purpose.

8. VESID's responsibilities with respect to this Agreement, including but not limited to its responsibility to reimburse OMRDD as set forth in Paragraph 7 above, shall be limited to the 767 individuals provided for in the OMRDD Contracts at the rate of $750 per client slots per quarter. Where separate contracts for intensive services exist (as identified in Attachment A), OMRDD shall transfer the actual expenditure amount of the contract and VESID shall reimburse OMRDD in the amounts reflected in the actual expenditure report, but such reimbursement shall not exceed the rates set in this paragraph.

9. VESID agrees that the monies appropriated to VESID as a result of the transfer of responsibilities for Supported Work from OMRDD shall be used for persons with developmental disabilities.

10. This Agreement shall be subject to modifications necessary to meet any State mandates relating to the operation and management of Supported Work programs.

Thomas Sobol

Thomas Sobol, Commissioner
New York State Education
Department

Elin M. Howe

Elin Howe, Commissioner
New York State Office of
Mental Retardation and
Developmental Disabilities

April 26, 1990
Dated

April 26, 1990
Dated

MEMORANDUM OF UNDERSTANDING BETWEEN THE STATE EDUCATION DEPARTMENT AND THE DEPARTMENT OF SOCIAL SERVICES REGARDING SUPPORTED EMPLOYMENT

The New York State Education Department, Office of Vocational and Educational Services for Individuals with Disabilities ("VESID") and the New York State Department of Social Services, Commission for the Blind and Visually Handicapped ("CBVH") agree to the following allocation of responsibilities in implementing Title VIc of the 1986 Amendments to the Rehabilitation Act (Public Law 99-506) and 34 CFR 363, State Supported Employment Services Program ("Supported Employment"). Supported Employment will be administered in accordance with the purposes and provisions detailed in the applicable provisions of Title VIc and the regulations promulgated thereunder.

1. This agreement is effective April 1, 1990, and continues to be in effect unless amended or terminated by mutual agreement. This agreement is contingent upon a continued availability of Federal funding and State appropriation of those funds.

2. CBVH will maintain all contracts entered into with Title VIc providers with funds made available for supported employment prior to April 1, 1990, until such contracts expire (the CBVH Contracts). See Attachment A for a list of the CBVH Contracts.

3. Primary responsibility for the CBVH Contracts will remain with CBVH. The CBVH Contract providers will continue to report directly to CBVH; CBVH will, in turn, provide copies of reports, as required by VESID, to VESID for the purpose of general monitoring and oversight. CBVH shall amend the CBVH Contracts to ensure that providers and third parties provide VESID the same authority to enter premises to review and monitor programs that they currently provide to CBVH.

4. Future contracts for intensive services for legally blind persons under Supported Employment will be the sole responsibility of VESID. VESID will develop contracts and assume sole administrative, monitoring and programmatic responsibility for all funds appropriated after April 1, 1990 for supported employment, or other integrated employment options related to supported employment for legally blind individuals.

5. CBVH will retain client specific case management responsibilities for all legally blind individuals in Supported Employment, regardless of which vocational agency is the contractor, using qualified vocational rehabilitation counselors trained in working with this population.

6. CBVH will assist VESID in establishing and maintaining a coordinated system for program development, statewide planning and request for proposal process for legally blind individuals in supported employment. In addition, CBVH agrees to assist VESID in developing program standards, program review procedures,

coordinated referral processes, and quality assurance standards to be in place by October 1, 1990.

7. In consultation with the Rehabilitation Services Administration ("RSA"), CBVH and VESID will initiate activities designed to ensure that, effective October 1, 1990, VESID is the designated State unit responsible for the implementation of Title VIc supported employment programs for those who are legally blind. To the extent necessary, the State plans of both CBVH and VESID will be modified to reflect that Federal Title VIc Supported Employment funds will be administered by VESID. Those funds which would have been allocated to CBVH for intensive Supported Employment services and are allocated to VESID as a result of this agreement will continue to be specifically directed towards services for people who are legally blind.

8. This agreement will be subject to modifications necessary to comply with any State or Federal mandates relating to the operation and management of Title VIc supported employment programs for people who are legally blind.

Thomas Sobol

Thomas Sobol
Commissioner
NYS Education Department

April 19, 1990
Dated

Cesar A Perales

Cesar A. Perales
Commissioner
NYS Department of Social Services

April 25, 1990
Dated

ATTACHMENT A

CBVH CONTRACTS

AGENCY	CONTRACT NUMBER
Jewish Guild for the Blind	C002999
Association for the Blind and Visually Impaired of Greater Rochester, Inc.	C002998
New York Association the Blind	C002997
Pioneer, Inc.	C002996
Helen Keller Services for the Blind	C002995
Central Association for the Blind	C002994

Appendix C

List of VESID District Offices

VESID DISTRICT OFFICES

ALBANY DISTRICT OFFICE
Thomas Paduano, Manager
55 Elk Street, Room 301
Albany, New York 12207
(518) 473-8097
TTY: (518) 473-8467

SOUTHERN TIER DISTRICT OFFICE
Richard Andres, Manager

BINGHAMTON OFFICE
92 Hawley Street
Binghamton, New York 13901
(607) 773-7830
TTY: (607) 773-7998

ELMIRA OFFICE
110 West Second Street
Elmira, New York 14901
(607) 734-5294
V/TTY: (607) 734-4676

BRONX DISTRICT OFFICE
George Cortright, Manager
1500 Pelham Parkway South
1st Floor
Bronx, New York 10461
(212) 931-3500
TTY: (212) 828-4003

BROOKLYN DISTRICT OFFICE
Danna Mitchell, Manager
111 Livingston Street
23rd Floor
Brooklyn, New York 11201
(718) 834-6550
TTY: (718) 834-6562

BUFFALO DISTRICT OFFICE
Duane Reggentine, Manager
125 Main Street, 8th Floor
State Office Building
Buffalo, New York 14203
(716) 847-3294
TTY: (716) 847-1495

BUFFALO PSYCHIATRIC CENTER
400 Forest Avenue
Bldg. #51
Buffalo, New York 14213-1298

HAUPPAUGE DISTRICT OFFICE
Jerold Donowitz, Manager
State Office Building
Veterans Highway
Hauppauge, New York 11788
(516) 360-6357
TTY: (516) 360-6370

RIVERHEAD OFFICE
Plaza 518
East Main Street
Riverhead, New York 11901
(516) 727-6496

HEMPSTEAD DISTRICT OFFICE
Leo Schechter, Manager
50 Clinton Street, Room 708
Hempstead, New York 11550
(516) 483-6510
TTY: (516) 483-6087

MALONE DISTRICT OFFICE
John Ray, Manager
East Main Street Road
Rt. 1, Box 39
Malone, New York 12953
(518) 483-3530
V/TTY: (518) 483-6070

MANHATTAN DISTRICT OFFICE
John Bertrand, Manager
116 West 32nd Street, 6th Floor
New York, New York 10001
(212) 563-6400
TTY: (212) 563-8361
(212) 563-8351

STATEN ISLAND OFFICE
1139 Hylan Boulevard
Staten Island, New York 10305
(718) 816-4800

HARLEM OFFICE
163 West 125th Street
New York, New York 10027
(212) 870-4420

MID-HUDSON DISTRICT OFFICE
Harriet Fein, Manager
120 Dutchess Turnpike
Canterbury Plaza
Poughkeepsie, New York 12603
(914) 452-5325
TTY: (914) 452-5995

KINGSTON OFFICE
268 R Clinton Avenue
Willow Park, Bldg. #2
Kingston, New York 12401
(914) 339-4270
TTY: (914) 339-4254

MIDDLETOWN OFFICE
280 Route 211 East
Middletown, New York 10940
(914) 343-7951
TTY: (914) 343-4969

QUEENS DISTRICT OFFICE
George Cortright, Manager
1 LeFrak Plaza
59-17 Junction Blvd.
20th Floor
Corona, New York 11368
(718) 271- 9346
TTY: (718) 271-9799

ROCHESTER DISTRICT OFFICE
Paul Pfrommer, Manager
109 South Union Street, 2nd Floor
Rochester, New York 14607
(716) 238-2900
TTY: (716) 325-6278

SYRACUSE DISTRICT OFFICE
Marvin Reed, Manager
333 East Washington Street
Room 230
State Office Building
Syracuse, New York 13202
(315) 428-4179
TTY: (315) 426-2155

ONONDAGA PLAZA OFFICE
(Same address as above)

UTICA DISTRICT OFFICE
Dave Segalla, Acting Manager
State Office Building
207 Genesee Street, Room 801
Utica, New York 13501
(315) 793-2536
TTY: (315) 793-2667
1-800-624-6202

JOHNSTOWN OFFICE
2 South Market Street
Johnstown, New York 12095
(518) 736-1039

WHITE PLAINS DISTRICT OFFICE
Sandra Countee, Manager
55 Church Street, 3rd Floor
White Plains, New York 10601
(914) 946-1313
TTY: (914) 946-1520

ROCKLAND OFFICE
30 Orangetown Center
Orangeburg, New York 10962
(914) 359-1042
TTY: (914) 359-1703

Appendix D

List of Independent Living Centers

INDEPENDENT LIVING CENTERS

ALBANY CENTER

Todd Eggert
Executive Director
Capital District Center for Independence
West Mall Office
845 Central Avenue
Albany, New York 12206

AMSTERDAM CENTER

Bonnie Page
Executive Director
Independent Living Center of Amsterdam
135 Guy Park Avenue
Amsterdam, New York 12010

AUBURN CENTER

Virginia Ellis
Executive Director
Options for Independence
55 Market Street
Auburn, New York 13021

BATAVIA CENTER

Linda Olson
Executive Director
Batavia Center for Independent Living
61 Swan Street
Batavia, New York 14020

BINGHAMTON CENTER

Maria Dibble
Executive Director
Southern Tier Independence Center
107 Chenango Street
Binghamton, New York 13901

BRONX CENTER

Bobbi Linn
Executive Director
Bronx Independent Living Services, Inc.
3525 Decatur Avenue
Bronx, New York 10467

BROOKLYN CENTER

Denise McQuade
Executive Director
Brooklyn Center for Independence of the Disabled
408 Jay Street
Brooklyn, New York 11201

BUFFALO CENTER

Douglas Usiak
Executive Director
Western New York Independent Living Project, Inc.
3108 Main Street
Buffalo, New York 14214

CORNING CENTER

Norman White
Executive Director
Access to Independence and Mobility
271 East First Street
Corning, New York 14830

DELAWARE CENTER

Richard Zachmeyer
Executive Director
Catskill Center for Independence
P.O. Box 1247, Route 23 Southside
Oneonta, New York 13820

GLENS FALLS CENTER

Brad Williams
Executive Director
Glens Falls Independent Living Center
P.O. Box 453
Glens Falls, New York 12801

HARLEM CENTER

Junius Kellogg
Acting Executive Director
c/o Harlem Hospital Center
506 Lenox Avenue
New York, New York 10037

ITHACA CENTER

Terry Ofner
Executive Director
Finger Lakes Independence Center
609 West Clinton Street, Clinton W. Plaza
Suite 112
Ithaca, New York 14850

JAMESTOWN CENTER

Marie Carrubba
Executive Director
Southwestern Independent Living Center, Inc.
878 North Main Street
Jamestown, New York 14701

KINGSTON CENTER

Joan Gundersen
Executive Director
Resource Center for Accessible Living
602 Albany Avenue
Kingston, New York 12401

MANHATTAN CENTER

Marilyn Saviola
Executive Director
Center for Independence of the Disabled
in New York
841 Broadway, Room 205
New York, New York 10003

MASSENA CENTER

Jeffrey Reifensnyder
Executive Director
Massena Independent Living Center
One North Main Street
Massena, New York 13662

MIDDLETOWN CENTER

Donna Miller
Executive Director
Western Orange County Center for
Independent Living
R.D. #1, Box 144c, Route 6
Slate Hill, New York 10973

NASSAU CENTER

Patricia Moore
Executive Director
Long Island Center for Independent
Living, Inc.
3601 Hempstead Turnpike
Levittown, New York 11756

NEWBURGH CENTER

Doug Hovey
Executive Director
Eastern Orange County Center for Independent
Living
200 Lake Street
Newburgh, New York 12550

NIAGARA FALLS CENTER

Ronald Clark
Executive Director
Niagara Frontier Center for Independent
Living, Inc.
1522 Main Street
Niagara Falls, New York 14305

OLEAN CENTER

Anna Armstrong
Executive Director
Directions in Independent Living
1 Holiday Park Centre, Suites A & B
2636 West State Street
Olean, New York 14760

PLATTSBURGH CENTER

Cecily S. Feldman
Executive Director
North Country Center for Independence
159 Margaret Street
Plattsburgh, New York 12901

POUGHKEEPSIE CENTER

Mary Wambach
Executive Director
Taconic Resources for Independence
82 Washington Street
Poughkeepsie, New York 12601

QUEENS CENTER

Michael McIntyre
Executive Director
Queens Independent Living Center
140-40 Queens Boulevard
Jamaica, New York 11435

ROCHESTER CENTER

Judi DiGuiseppe
Executive Director
Rochester Center for Independent Living
758 South Avenue
Rochester, New York 14620

ROCKLAND CENTER

Susan Finisdore
Executive Director
Rockland Independent Living Center
235 North Main Street
Spring Valley, New York 10977

STATEN ISLAND CENTER

Dorothy Doran
Executive Director
Staten Island Center for Independent Living
150 Walker Street
Staten Island, New York 10302

SUFFOLK CENTER

June Roberts
Executive Director
Self Initiated Living Options, Inc.
3241 Route 112, Building #7
Medford, New York 11763

SYRACUSE CENTER

John Bateman-Ferry
Executive Director
ARISE
501 East Fayette Street
Syracuse, New York 13202

TROY CENTER

Denise Figueroa
Executive Director
Troy Resource Center for Independent Living
Troy Atrium
Broadway and 4th Street
Troy, New York 12180

UTICA CENTER

Burt Danovitz
Executive Director
Resource Center for Independent Living
Columbia Place
409 Columbia Street
Utica, New York 13502

WATERTOWN CENTER

Catharine Keane
Executive Director
Northern Regional Center for Independent Living
Suite 400
Woolworth Building
Watertown, New York 13601

WHITE PLAINS CENTER

Joseph Bravo
Executive Director
Westchester Independent Living Center
297 Knollwood Road
White Plains, New York 10607

YONKERS CENTER

Harry Kaplan
Executive Director
Westchester Disabled on the Move
984 North Broadway
Yonkers, New York 10701

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ALBANY, NEW YORK 12234

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